

NT PLANNING COMMISSION HEARING

PROPOSED NT PLANNING SCHEME AMENDMENT PA2025/0283

Lots 3494 and 5727, Town of Darwin
(121 Mitchell Street & 12 Doctors Gully Road Larrakeyah)

Agenda Item Number: **2**

Meeting Date: 14 November 2025

Attachment A – Exhibition Material

Attachment B – Submissions Received



Ellen Shannon

Senior Planner, Lands Planning

Report to the Planning Commission

This report is prepared under section 22 of the *Planning Act 1999*, and considers the submissions made in relation to the proposal.

1. GENERAL INFORMATION

ADDRESS:	Lots 3494 and 5727, Town of Darwin (121 Mitchell St and 12 Doctors Gully Rd, Larrakeyah)
AREA:	3488 m ²
CURRENT ZONE:	Zone LMR (Low-Medium Density Residential)
PROPOSED ZONE:	Specific Use Zone
PROPOSED LAND USE:	Dwelling-multiple or dwelling-group
APPLICANT:	Brad Cunningham, Cunningham Rosse Town Planning and Consulting
LAND OWNER:	Young Women's Christian Association of Australia

2. LEGISLATIVE REQUIREMENTS

The Minister for Lands, Planning and Environment is responsible for determining proposals to amend the NT Planning Scheme 2020 (NTPS), including the rezoning of land. The *Planning Act 1999* (The Act) establishes requirements relating to the exhibition, consultation and reporting of proposed amendments to the NTPS.

Under section 22(6), the Planning Commission must hold a hearing if submissions are received during the exhibition period, and the Chairperson is satisfied that a hearing would provide further useful information.

Under section 24 of the Act, the Planning Commission must provide to the Minister for Lands, Planning and Environment, a written report that addresses the issues raised in the submissions; the issues raised at the hearing and during any consultation; and any other matters the Commission considers the Minister should take into account when considering the proposal.

3. PROPOSAL

The proposal seeks to rezone Lots 3494 and 5727 Town of Darwin (121 Mitchell St and 12 Doctors Gully Rd, Larrakeyah) from Zone LMR (Low-Medium Density Residential) to a Specific Use Zone. It also proposes a consequential update to the Central Darwin Area Plan (CDAP) to reflect the rezoning.

The application states that the amendment seeks to facilitate the development of social and affordable housing that would otherwise be permitted in Zone HR (High-Density Residential) if it met the NTPS car parking requirements for dwelling-multiple or dwelling-group.

A copy of the exhibition material, including the application is at **Attachment A**.

4. SITE AND LOCALITY CONTEXT

Site Description

The site, comprising both Lot 3493 and Lot 5727, has an area of 3 488 m². The site has a frontage to Mitchell Street of approximately 64m and a frontage to Doctors Gully Road of approximately 23m. Lot 5727 currently contains a two-storey building which previously operated as a hostel and Lot 3494 contains a single dwelling.

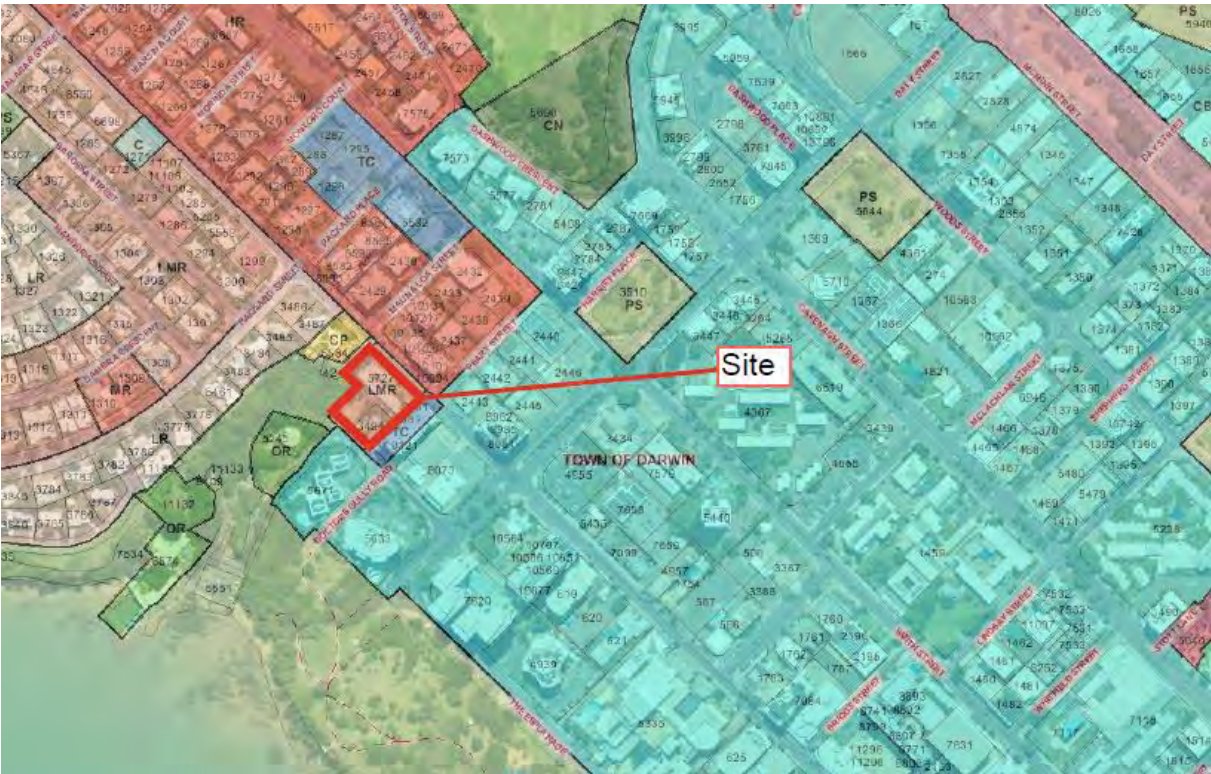
The Central Darwin Area Plan (CDAP) contains the land use vision for Central Darwin and is the relevant strategic framework document for the site. It identifies the site as a potential area of change from Zone LMR to Zone TC (Tourist Commercial).

Locality Description

The site is located directly to the north-west of Darwin CBD and adjoins the northern end of Zone CB (Central Business). To the north-west of the site is the neighbourhood of Larrakeyah which comprises a mix of low, medium and high density residential development.

The site is surrounded by a mix of zones with land to the north and east zoned a mix of HR, LMR, LR (Low Density Residential), PS (Public Open Space) and OR (Organised Recreation) and Zone CB to the south and east. The adjoining site to the south at 10 Doctors Gully Road is zoned Tourist Commercial (TC). Existing development on surrounding sites ranges from one storey up to nine storeys and there is a bus stop located in front of the site on Mitchell Street.

Map 1: Showing Site, Surrounds and Zoning



5. EXHIBITION OF PROPOSAL

On 27 August 2025, the delegate for the Minister for Lands, Planning and Environment determined under section 13(3)(a) of the *Planning Act 1999* to continue consideration of the proposed amendment by placing it on exhibition.

The proposal was on public exhibition for a period of 28 days, in accordance with the requirements of the Act. The exhibition closing date was 3 October 2025.

6. SUBMISSIONS

Below is a summary of the matters raised in the submissions, refer **Attachments B1 – B24**.

Public Submissions (Attachments B1-B19)

Nineteen submissions were received from the public regarding this proposal. Two of the submissions were in support and four of the submissions objecting to the proposal were form letter responses.

Public Submissions in opposition (Attachments B1 and B17)

Submitter	Discussion Points
<p>Ari Syrimi (Attachment B1)</p>	<ul style="list-style-type: none"> • There was a deliberate decision to rezone Larrakeyah and the subject site LMR and it went through rigorous public dialogue and consideration. • The adjoining site at 10 Doctors Gully Road gained approval for a development without a need for rezoning and was designed specifically to manage impacts on surrounding land. • Development on the subject site would have detrimental impacts on residents at 10 Doctors Gully Road. • Concentration of low cost housing in this area will cause long term and lasting damage to Larrakeyah and the surrounding CBD. • The development will result in security concerns for the nearby existing childcare and risk its closure. • Case studies of South Australia and Victoria for the reduced car parking rate are not comparative because Darwin does not have the same level of public transport as these regions. • Social and affordable housing will only happen in the short term and in the long term the development will be sold off for private sale.
<p>Efstathios Tsirbas (Attachment B2)</p>	<ul style="list-style-type: none"> • Increased traffic and more people close to existing childcare may jeopardise the viability of the childcare. • The development will result in additional traffic congestion in Darwin City which is already busy and where there are scarce spots to park. • It will disturb households and impact on neighbourhood security. • It will result in a decline in home values in the area. • There would be damage to the unique woodland at Doctors Gully and it would endanger habitats and landmarks. • The development could impact on nearby tourist facilities and risk reduced revenue.

Submitter	Discussion Points
	<ul style="list-style-type: none"> • Developers could utilise the rezoning and deviate from the original intended plans for the site.
<p>George and Athina Tsirbas</p> <p>(Attachment B3)</p>	<ul style="list-style-type: none"> • Permitting high rise transitional accommodation poses serious risks to child safety and wellbeing. • The proposal will worsen traffic in an already congested area on the edges of Darwin CBD. • There is a risk of disruptive conduct because of the nature of transitional housing. • It would reduce nearby home values. • A location nearer key resources including shops, healthcare providers, therapy centres, job opportunities and a social hub would be better suited for this kind of development. • Proposal would impact on the nearby micro rainforest which is a crucial wildlife refuge and contains landmarks such as Peel's Well. • It may jeopardize nearby tourist attractions such as the fish feeding and Mindil Beach Markets. • Developers could change their intention after the rezoning is approved.
<p>Daniel Myers – Strata Chair</p> <p>Bethmini Daniel – Strata Secretary</p> <p>(Attachment B4 and B5)</p>	<ul style="list-style-type: none"> • The intent to increase density and vary car parking to enable affordable housing can be achieved without a rezoning as the current zone allows for residential uses. • The proposed zoning is a significant departure from Zone TC (Tourist Commercial) future use of the site and there is already an adequate supply of HR (High Density Residential) zoned land in the area. • An Exceptional Development Permit (EDP) may be more suitable for allowing social and affordable housing. • Allowing higher density social and affordable housing on this site may lead to a concentration of vulnerable populations. • There would be a drastic change in nature of the area for residents and visitors and a drop in value of nearby homes.
<p>Samantha and Drosso Lelekis</p> <p>(Attachment B6)</p>	<ul style="list-style-type: none"> • The proposal and reduced car parking rates would result in congestion and traffic safety issues particularly because of the reduced car parking rates. • Anything greater than 4-storeys in height will have a significant impact on the adjoining residents of Catalina Apartments and the surrounding environment.

Submitter	Discussion Points
	<ul style="list-style-type: none"> • The rezoning is inconsistent with the CDAP, and this type of rezoning should occur through comprehensive strategic planning rather than ad-hoc rezoning. • The development may result in various social problems because vulnerable inhabitants will have close proximity to licenced premises, and this may increase associated antisocial behaviour. • There are better locations for this type of development on existing road corridors that provide connectivity and public transport to Darwin CBD or other locations outside the inner City. • It would result in a reduction in property land value. • Existing infrastructure may be inadequate to accommodate the proposed development of this scale including water, sewer, electrical, waste collection, emergency services access.
<p>Andrew Brown (Attachment B7)</p>	<ul style="list-style-type: none"> • This proposal will further exacerbate existing car parking and traffic issues. • Uncertain about the scale of the proposal in terms of building height, setbacks, site coverage with open space and green area. • Doctors Gully has a much smaller scale than sites on Mitchell Street in the CBD and no effort has been made to manage this including impacts on the adjacent childcare facility. • Health and safety concerns arising from the proposal and the childcare facility next door because of increased traffic, construction impacts, safety at pick up and drop off time. • The application should be refused unless the Specific Use Zone includes built form controls. • Concerns that YWCA will sell their sites to developers who can use the Specific Use Zone without any social and affordable housing. Requests the approval is conditional on the site being developed by YWCA for disadvantaged families only. • It may result in domestic violence situations and endanger nearby residents.
<p>Nicholas Kirlew – PLan: The Planning Action Network Inc (Attachment B8)</p>	<ul style="list-style-type: none"> • There are no numerical requirements for height, setbacks, site coverage, deep soil planting or open space in the Specific Use Zone making it uncertain what the scale of development will be. It would be more appropriate to rezone to HR • Doctors Gully Road is much lower in scale than Mitchell Street and there is no transition to the lower scale. • No data has been provided to demonstrate residents of social housing have fewer cars.

Submitter	Discussion Points
	<ul style="list-style-type: none"> • The rezoning has not mentioned the sensitive use, being a childcare that is adjacent to the site and its location close by may result in safety concerns. • The consultation undertaken by the developer to date was not transparent. • No information has been provided in relation to management of stormwater, shading, deep soil planting or canopy cover.
<p>Nicola Jackson (Attachment B9)</p>	<ul style="list-style-type: none"> • The site is extremely visible and accessible for alleged abusers and puts the victims at risk. A location that is not easily seen and on a main road would be more appropriate for this type of use. • Consultation undertaken by developer was tokenistic and no changes have been made to the proposal in response to community concerns. • The scale of the proposed development would impact on the character of the neighbourhood and the nearby Larrakeyah Well and Doctors Gully walking paths. • Already congested roads including Mitchell Street will worsen with the proposal. The reduction in parking is shortsighted and consideration hasn't been given to staff of the facility. • Reduction in car parking poses a risk to community members. • Increased demand for existing services such as schools, childcare, infrastructure, transport etc. haven't been considered • Proposal will worsen anti-social behaviour in the area and may increase alcohol related issues because of its location close to licensed venues.
<p>Mario Tsirbas (Attachment B10)</p>	<ul style="list-style-type: none"> • Increased traffic and more people close to existing childcare may jeopardise the viability of the childcare. • Will result in additional traffic congestion in Darwin City which is already busy and has scarce spots to park. • It will disturb households and impact on neighbourhood security. • Will result in a decline in home values in the area. • There are more suitable sites for this type of development in other locations with closer proximity to essential infrastructure. • There would be damage to the unique woodland at Doctors Gully and it would endanger habitats and landmarks. • The development could impact on nearby tourist facilities and risk reduced revenue.

Submitter	Discussion Points
Skye Cochrane (Attachment B11)	<ul style="list-style-type: none"> • Ongoing growth in this area has meant nearby roads are often congested and parking is limited, and this development will worsen it. • Shift to high density and government supported housing will impact on the existing neighbourhood character. • Uncertainty about how this development may impact on value of nearby properties. • Areas like Palmerston, Berrimah or other parts of CBD already have infrastructure and would be better suited to this kind of development
Kenwood and Rachelle Lay (Attachment B12)	<ul style="list-style-type: none"> • The development would block ocean and sunset views for surrounding properties. • Inconsistent with CDAP's intent to have a transition in height between the CBD and low density Larrakeyah neighbourhood. • The development will increase traffic and on street parking in an area that already experiences congestion. • Loss of views and amenity impacts will directly affect market value and rental returns of surrounding properties.
Tina Griffiths (Attachment B13)	<ul style="list-style-type: none"> • The proposal is excessive in height and scale and will reduce privacy and amenity for neighbouring properties. • The development will create further congestion and parking pressures in an already constrained area. • The location next to a childcare facility raises safety, noise and traffic conflicts with the adjoining sensitive use. • Inconsistent with the established low-medium density character of the area. • It will set an undesirable precedent.

Form Letters (Attachments B14 to B17)

Four form letters were received in response to the proposal from Nicho Peters (B14), Warren Fryer (B15), Stuart Charleston (B16) and Damien and Kim Charles (B17).

The submissions raised the following concerns:

- The proposed Specific Use Zone will undermine the intent of the existing LMR zoning and will give more flexibility to height, density and design.
- Development would overlook adjoining backyards, pool and rear windows and would result in a development that is not compatible with surrounding low-density development.
- There is currently limited parking availability in the surrounding streets and future development would worsen this. It will also result in safety issues with the nearby childcare as there will be less parking.

- High density development would detract from the established vegetation and green area near the site.
- Existing antisocial behaviour, violence and police call-outs will be amplified by the proposed development.
- There is already a transitional housing facility (Silos Roberts Hostel) located nearby and concentrating these services near each other will overburden the neighbourhood and is not considered best practice.
- A location that's already zoned for higher density with more capacity to expand infrastructure would be a better location for this type of development.
- The proposal has not adequately addressed the concerns raised through community consultation already undertaken by YWCA.

Public Submissions in support (Attachments B18 and B19)

The two submissions in support are summarised in the table below:

Submitter	Discussion Points
Morgan Rickard (Attachment B18)	<ul style="list-style-type: none"> • Evidence shows that developments of this nature with strong tenancy management reduces incidents of anti-social behaviour and improves neighbourhood cohesion. • It addresses a critical shortage of long-term housing options for women and children and is in the public interest. • It aligns with the strategic framework and <i>Planning Act 1999</i>. • A Specific Use Zone is appropriate to deliver the intended community benefit.
Michael Byrne - NT Shelter (Attachment B19)	<ul style="list-style-type: none"> • There is a severe shortage and high demand for accommodation for people experiencing domestic and family violence and this proposal will assist in addressing this. • YWCA is well equipped to undertake and manage this type of development. • Nature of this type of tenancy would be 1 bed households making the reduced car parking appropriate. • The site is ideally located close to public transport and essential services, and it will suit the needs of single-parent households.

Service Authority Comments (Attachments B20 to B23)

Comments received from Service Authorities are summarised in the table below.

Service Authority	Comments
Transport & Civil Infrastructure,	<ul style="list-style-type: none"> • No objection.

Department of Logistics & Infrastructure (DLI) (Attachment B20)	
Power and Water Corporation (Power) (Attachment B21)	<ul style="list-style-type: none"> • No objection. • If approved, YWCA shall engage an accredited electrical consultant and contractor to design and construct the required underground power servicing suitable for the future subdivision/development.
Power and Water Corporation (Water) (Attachment B22)	<ul style="list-style-type: none"> • No objection • Easements shall be created over all Power and Water assets that traverse the subject lots. • Future development could trigger various upgrades to existing water and sewer infrastructure.
Department of Housing, Local Government and Community Development (Attachment B23)	<p>Support for the proposal because:</p> <ul style="list-style-type: none"> • Since closure of the old facility on the site there have been no new housing options for women and children escaping violence in the CBD and the development will fill a much-needed gap. • There is currently imbalance of housing concentration as some areas in Darwin and Palmerston have high concentration of low-income residents separated from services. Encouraging a mix of tenures is seen as a potential solution to improve wellbeing and social outcomes. • Potential for YWCA to receive funding under future rounds of Housing Australia Future Fund.

Local Authority Submission (Attachment B24)

City of Darwin Council (Attachment B24)
<ul style="list-style-type: none"> • No objections in principle. • Not contrary to the Compact Urban Growth Policy, Darwin Regional Land Use Plan, and only a minor administrative change to the CDAP. • Generally consistent with the applicable requirements of the Act.

7. RECOMMENDATION

That under section 24 of the *Planning Act 1999*, the Planning Commission report to the Minister for Lands, Planning and Environment on the issues raised in submissions, issues raised at the hearing and any other matters it considers the Minister should take into account when considering the proposal.

NORTHERN TERRITORY OF AUSTRALIA
PROPOSAL TO AMEND NT PLANNING SCHEME
PA2025/0283

A delegate of the Minister for Lands, Planning and Environment has accepted an application to amend the NT Planning Scheme 2020 made by Cunnington Rosse Town Planning and Consulting for exhibition. The application seeks to:

- rezone Lots 3494 and 5727 Town of Darwin (212 Doctors Gully Road and 121 Mitchell Street, Larrakeyah) from Zone LMR (Low-Medium Density Residential) to a Specific Use Zone; and
- amend the Central Darwin Area Plan to reflect the change in land use of the subject site.

The proposed amendment is intended to facilitate development of social and affordable housing in a form consistent with Zone HR (High Density Residential) development requirements, although with reduced car parking rates.

Attached are:

- a locality map, existing zoning map and proposed map
- extracts from the NT Planning Scheme 2020 relating to Zone LMR (Low-Medium Density Residential);
- a copy of the application (including the proposed Specific Use Zone submitted with the application).

Period of Exhibition and Lodging a Submission

The exhibition period is from Friday 5 September 2025 to Friday 3 October 2025.

The suitability of the subject site for uses in accordance with the proposed zone is the primary consideration in the assessment of proposals to amend the NT Planning Scheme 2020. Matters relating to the intended development of the site are addressed in the development application and assessment processes.

Written submissions about the proposed planning scheme amendment are to be received by 11.59pm on Friday 3 October 2025 and addressed to:

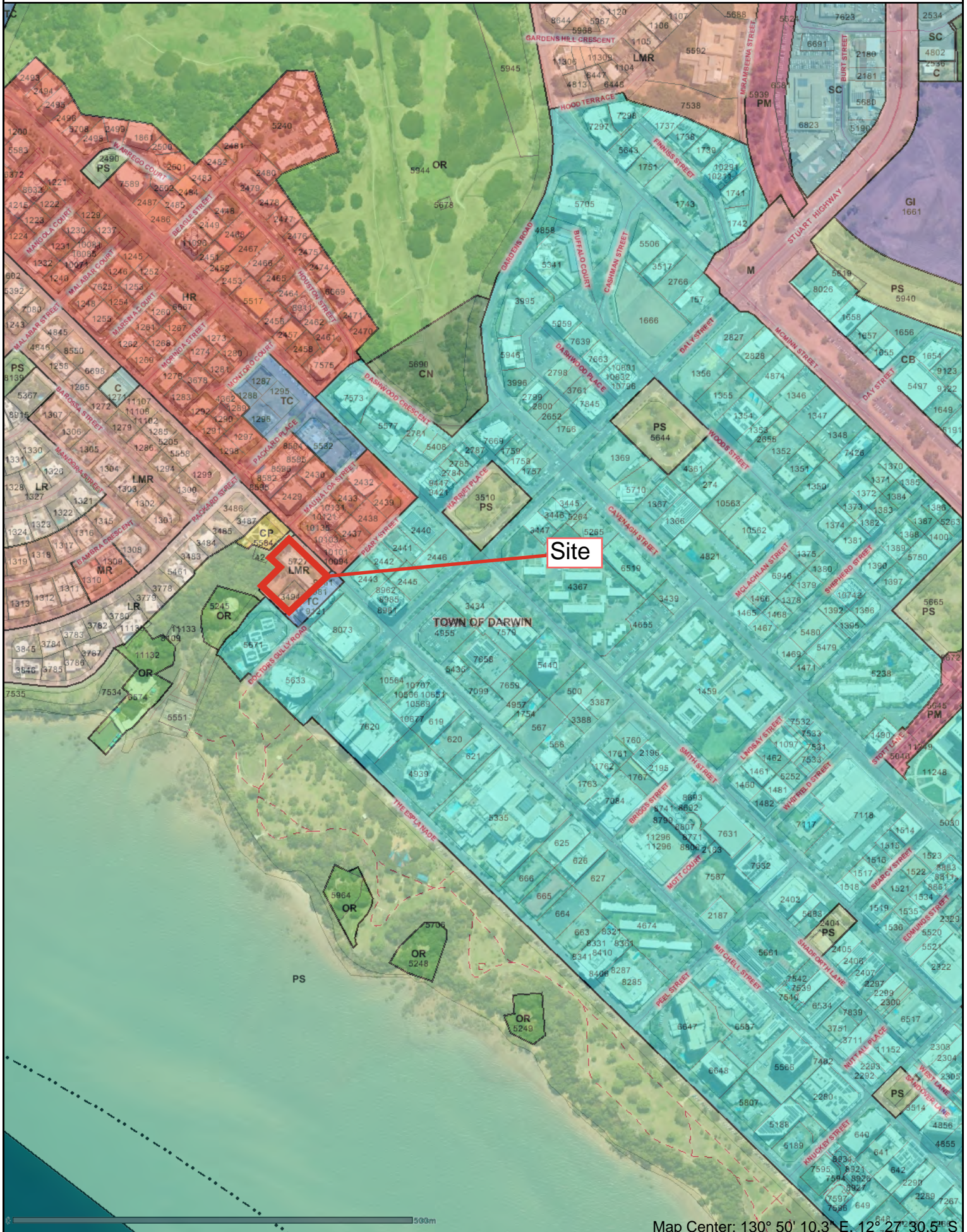
NT Planning Commission
GPO Box 1680
DARWIN NT 0801; or

Email: planning.ntg@nt.gov.au; or

Fax: (08) 8999 7189; or

Hand delivered to Level 1 Energy House 18-20 Cavenagh Street Darwin CBD.

For more information please contact Ellen Shannon, Lands Planning on (08) 8999 7684 or ellen.shannon@nt.gov.au.

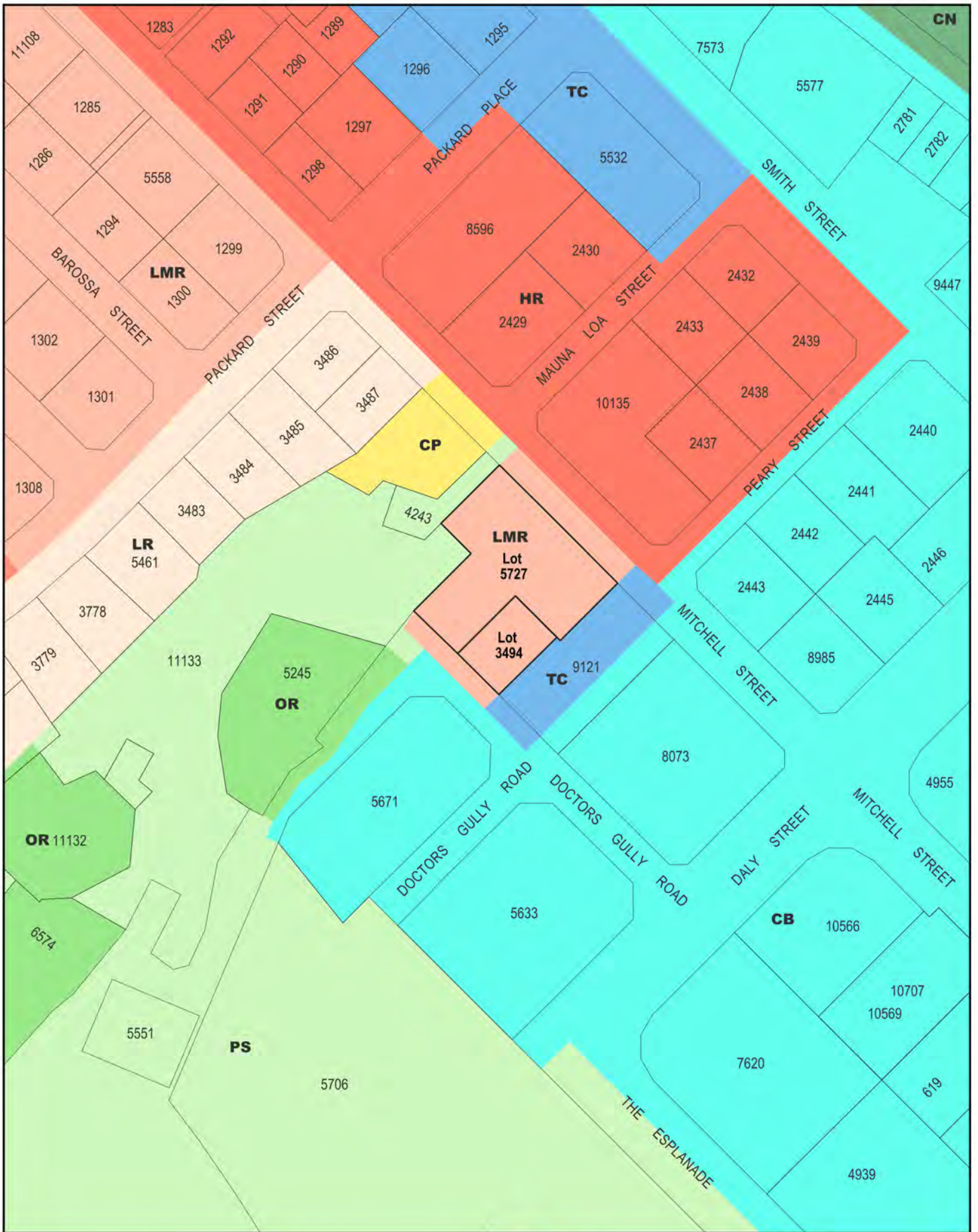


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Bottom Left: -12° 27' 40", 130° 49' 50" Top Right: -12° 27' 20", 130° 50' 30" Approximate Scale: 1:6,100 Datum: GDA 1994

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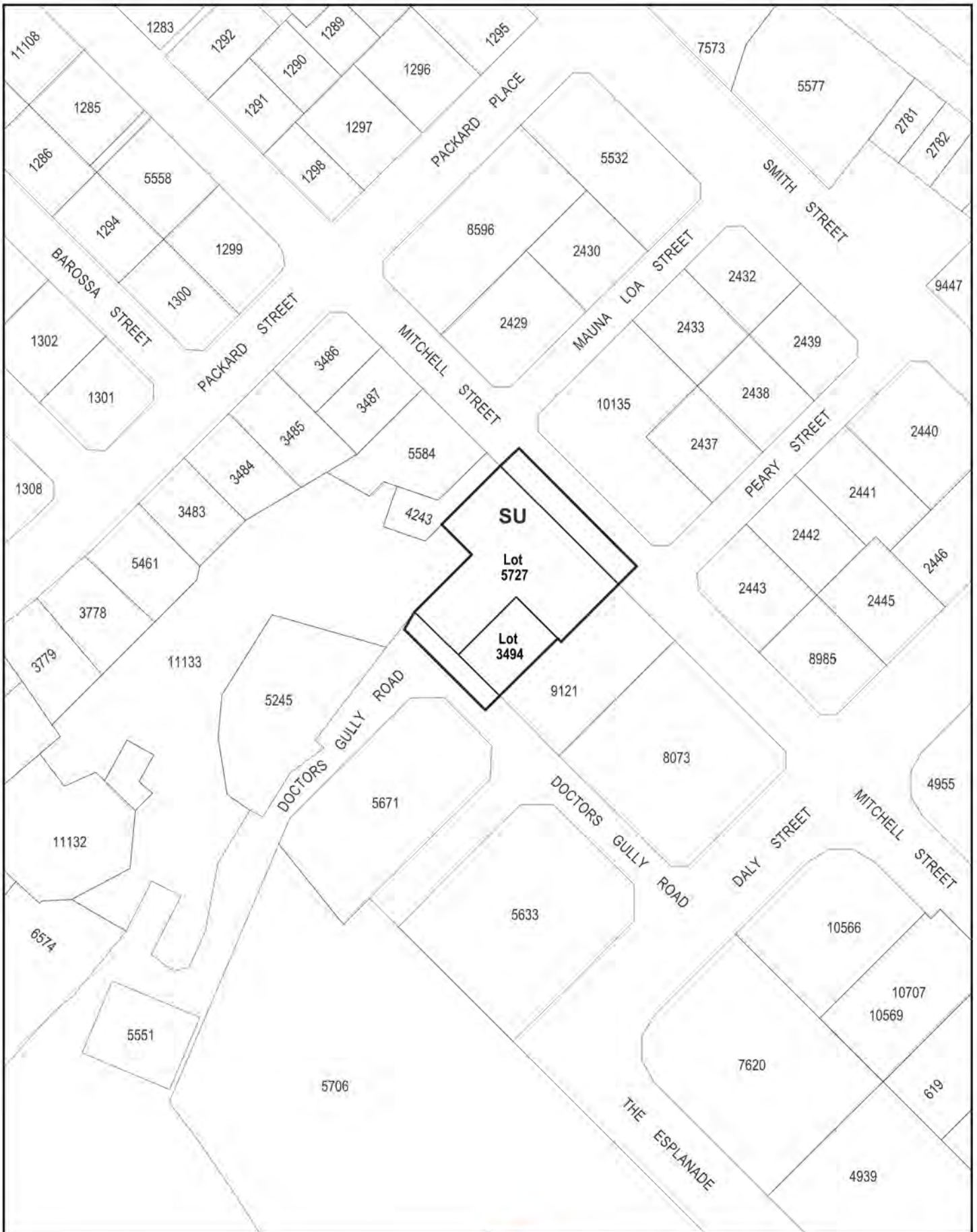
Existing NT Planning Scheme
 Amendment PA2025/0283
 Rezone Lots 3494 and 5727
 Town of Darwin
 From LMR (Low Medium Density Residential)
 to SU (Specific Use)



Department of Lands, Planning and Environment



File No: PA2025/0283
 Date: 21/08/2025



Proposed NT Planning Scheme
 Amendment PA2025/0283
 Rezone Lots 3494 and 5727
 Town of Darwin
 From LMR (Low Medium Density Residential)
 to SU (Specific Use)



Department of Lands, Planning and Environment



File No: PA2025/0283
 Date: 21/08/2025

4.3 Zone LMR – Low-Medium Density Residential

Zone Purpose

Provide a range of low rise housing options that contribute to the streetscape and residential **amenity** in locations supported by community services and facilities, and where full reticulated services are available.

Zone Outcomes

1. A blend of **dwelling-single**, associated **dwelling-independent**, **dwelling-group** and **dwelling-multiple** predominantly of two **storeys** or less, on a range of lot sizes that respond to changing community needs.
2. **Home based businesses** and **dwelling-community residence** are conducted in a manner consistent with residential **amenity**.
3. **Residential care facilities** are of a scale and conducted in a way that maintains the residential character and **amenity** of the zone.
4. Non-residential activities such as **community centres**:
 - (a) support the needs of the immediate residential community;
 - (b) are of a scale and intensity compatible with the residential character and **amenity** of the area;
 - (c) wherever possible, are co-located with other non-residential activities in the locality;
 - (d) avoid adverse impacts on the local road network; and
 - (e) are managed to minimise unreasonable impacts to the **amenity** of surrounding residents.
5. Building design, **site** layout and landscaping provide a sympathetic interface to the adjoining public spaces and between neighbours, provides privacy and attractive outdoor spaces.
6. An efficient pattern of land use with all lots connected to reticulated services, integrated with existing transport networks, and with reasonable **access** to open space and community facilities.

ASSESSMENT TABLE – ZONE LMR – LOW-MEDIUM DENSITY RESIDENTIAL					
Defined Use	Assessment Category	Overlays	General Development Requirements	Location Specific Development Requirements	Specific Development Requirements
Caravan Accommodation	Permitted	3.4 CR – Coastal Reclamation	5.2.1 General Height Control		5.4.11 Caravan Accommodation
Community Centre	Impact assessable		5.2.4 Car Parking		
Demountable Structures	Merit assessable	3.6 LSF – Land Subject to Flooding	5.2.6 Landscaping		5.8.7 Demountable Structures
Dwelling-Community Residence	Permitted	3.7 LSSS – Land Subject to Storm Surge	5.2.7 Setbacks for Development Adjacent to Land in Zones LR, LMR, MR or HR		5.4.14 Dwelling-Community Residence
Dwelling-Group (2)	Permitted	3.8 LADR – Land Adjacent to a Designated Road			5.4.1 Residential Density 5.4.3 Building Setbacks of Residential Buildings and Ancillary Structures 5.4.4 Extensions and Structures Ancillary to a Dwelling-Group or Dwelling-Multiple Development 5.4.6 Private Open Space 5.4.8 Residential Building Design 5.4.17 Building Articulation
Dwelling-Group (3+)	Merit assessable	3.10 MRT – Residential Development in Major Remote Towns			5.4.1 Residential Density 5.4.3 Building Setbacks of Residential Buildings and Ancillary Structures 5.4.4 Extensions and Structures Ancillary to a Dwelling-Group or Dwelling-Multiple Development 5.4.6 Private Open Space 5.4.8 Residential Building Design 5.4.17 Building Articulation
		3.11 RCFR – Rapid Creek Flood Response			
		3.14 HHLSI – Land in proximity to Helicopter Landing Sites of Strategic Importance			
Dwelling-Independent	Permitted				5.4.3 Building Setbacks of Residential Buildings and Ancillary Structures 5.4.6 Private Open Space 5.4.13 Dwelling-Independent

ASSESSMENT TABLE – ZONE LMR – LOW-MEDIUM DENSITY RESIDENTIAL					
Defined Use	Assessment Category	Overlays	General Development Requirements	Location Specific Development Requirements	Specific Development Requirements
Dwelling-Multiple	Merit assessable	3.4 CR – Coastal Reclamation 3.6 LSF – Land Subject to Flooding 3.7 LSSS – Land Subject to Storm Surge 3.8 LADR – Land Adjacent to a Designated Road	5.2.1 General Height Control 5.2.4 Car Parking 5.2.6 Landscaping 5.2.7 Setbacks for Development Adjacent to Land in Zones LR, LMR, MR or HR		5.4.1 Residential Density 5.4.3 Building Setbacks of Residential Buildings and Ancillary Structures 5.4.4 Extensions and Structures Ancillary to a Dwelling-Group or Dwelling-Multiple Development 5.4.6 Private Open Space 5.4.7 Communal Open Space 5.4.8 Residential Building Design 5.4.17 Building Articulation
Dwelling-Single	Permitted	3.10 MRT – Residential Development in Major Remote Towns			5.4.1 Residential Density 5.4.3 Building Setbacks of Residential Buildings and Ancillary Structures 5.4.6 Private Open Space
Excavation and Fill	Impact assessable				5.8.9 Excavation and Fill
Home Based Business	Permitted	3.11 RCFR – Rapid Creek Flood Response			5.4.10 Home Based Businesses
Residential Care Facility	Impact assessable	3.14 HHLSI – Land in proximity to Helicopter Landing Sites of Strategic Importance			5.4.3 Building Setbacks of Residential Buildings and Ancillary Structures 5.4.7 Communal Open Space 5.4.8 Residential Building Design 5.4.15 Residential Care Facility 5.4.17 Building Articulation
Sex Services-Home Based Business	Permitted				5.4.10 Home Based Businesses
Telecommunications Facility	Impact assessable				5.8.10 Telecommunications facility
All other uses defined in Schedule 2 (Definitions)	Prohibited				
Undefined Uses Any use not defined in Schedule 2 (Definitions)	Prohibited				



Planning Scheme Amendment

LOTS 5727 AND 3494 TOWN OF DARWIN (121 MITCHELL STREET & 12 DOCTORS GULLY ROAD, LARRAKEYAH)

June 2025

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Document Control

Author	Brad Cunnington
Version	1.3
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Table of Contents

Contact	0
Important Note	1
Document Control.....	1
Attachments:.....	2
1.0 Introduction	3
1.1 Background and Development Context	3
1.2 Intended Development Outcomes	4
2.0 Site and Locality	5
2.1 Site	5
2.2 Locality	8
3.0 Planning History	10
4.0 Section 12A(2) of the Act	10
4.1 Section 12(A)(2)(a) – Explanation of the Proposed Amendment	11
4.2 Section 12A(2)(b) – Purpose and Effect of Amendment.....	17
4.3 Section 12A(2)(c) – Relevant Matters under Section 13(1)	18
4.4 Section 12A(2)(d) – Community Consultation	28
5.0 Conclusion.....	28

Attachments:

- | | |
|----------------------------|-------------------------|
| A. Draft Specific Use Zone | C. 3494 Title |
| B. 5727 Title | D. Consultation Summary |

1.0 Introduction

Cunnington Rosse Town Planning and Consulting have been engaged by YWCA Australia, the landowner of lots 5727 and 3494 Town of Darwin, to prepare, lodge and manage a submission to the Northern Territory Minister for Infrastructure, Planning and Logistics to amend the Northern Territory Planning Scheme. The amendment is threefold, and comprises:

- Rezoning the subject land at lots 5727 and 3949 Town of Darwin (121 Mitchell Street and 12 Doctors Gully Road, Darwin City) from Zone LMR (Low Medium Density Residential) to a specific use zone;
- Introducing a specific use zone applicable to the subject land only into **Schedule 4** of the Planning Scheme; and
- Amending the Central Darwin Area Plan to reflect the intended transition from TC (Tourist Commercial) to the proposed Specific Use Zone.

This submission to amend the *Northern Territory Planning Scheme 2020* (the Scheme) is made pursuant to **Section 12A** of the *Northern Territory Planning Act 1999* (the Act).

The report describes the nature of the subject land and locality and considers the relevant planning history, site constraints, proposed uses and development on site, as well as the relevant provisions of **Section 12A(2)** and **Section 13(1)** of the Act, providing justification for the proposed amendment in relation to Northern Territory strategic planning policy and direction.

This report (and application) is to be read together with the draft specific use zone in **Attachment A**, the title details for the subject land in **Attachments B** and **C** and the summary of community consultation undertaken on behalf of the YWCA in **Attachment D**.

1.1 Background and Context

The Northern Territory has the highest rates of family and domestic violence in Australia, with Aboriginal people disproportionately over-represented. There are limited options for women experiencing domestic and family violence to exit crisis accommodation into secure, long-term housing, and no dedicated purpose-built housing for victim-survivors of family and domestic violence has been developed in Darwin or surrounding area. The YWCA have identified an immediate need for long-term housing for women who have been impacted by domestic or family violence.

YWCA National Housing is a community housing provider of medium to long term housing for women. YWCA provide over 120,000 nights of affordable accommodation each year through owned and operated properties in Victoria, Queensland and the Northern Territory.

The YWCA operated the Banyan View Lodge social housing complex within lot 5727 for nearly 50 years prior to its closure in 2019. In 2022, the YWCA purchased lot 3494 in order to improve potential redevelopment and housing options for the Banyan View Lodge site.

1.2 Intended Development Outcomes

The YWCA intend to redevelop the subject land to provide an integrated social and affordable housing complex to improve the availability of long-term housing for women victim-survivors of family and domestic violence, particularly those transitioning from emergency or short-term supported accommodation. The facility would be owned and operated by the YWCA, with a combination of affordable (rented to eligible tenants at a rate not more than 30% of their annual income) and social (through an affiliated public housing provider) housing.

Early development concepts have sought to determine possible development yield ensuring the provision of a range of accommodation types (primarily a range of 1, 2 and 3-bedroom apartments) whilst ensuring an appropriate provision of complimentary and ancillary elements including:

- Vehicle access and car parking, with the intention for car parking in a basement level to ensure desired spatial outcomes and amenity at ground level;
- Provision of management and administration areas, communal facilities, communal and private open space; and
- Service infrastructure, including substations, fire access and egress, booster equipment, metering and electrical switchboards.

Given the nature of surrounding development and land use zones within the immediate locality, development concepts (and the draft Specific Use Zone) have been primarily based on Zone HR (High Density Residential), with specific land use criteria for social and affordable housing to reflect the unique land use demands and outcomes associated with intended development outcomes.

2.0 Site and Locality

2.1 Site

The site is identified and described in **Table 1** and **Figure 1** below.

Site Details	
Location	Lot 5727 and Lot 3494 Town of Darwin (121 Mitchell Street and 12 Doctor Gully Road, Darwin City)
Title Reference and Land Tenure	CUFT 829 953 Estate in Fee Simple (5727); CUFT 866 250 Estate in Fee Simple (3494)
Area	3,488m ² (combined)
Easements	Sewerage Easement to Power and Water Corporation (5727 only)
Planning Considerations (Existing)	
Planning Scheme	Northern Territory Planning Scheme 2020
Zone	LMR (Low-Medium Density Residential)
Strategic Framework	<ul style="list-style-type: none"> Northern Territory Compact Urban Growth Policy Darwin Regional Land Use Plan Central Darwin Area Plan
Planning Considerations (Proposed)	
Planning Scheme	Northern Territory Planning Scheme 2020
Zone	SDX (Specific Use Darwin)
Strategic Framework	<ul style="list-style-type: none"> Darwin Regional Land Use Plan Central Darwin Area Plan
Purpose of Amendment	Dwellings-Multiple for the purpose of social and affordable housing by a registered Community Housing Provider



Figure 1: Subject Site

The subject land comprises lots 5727 and 3494 Town of Darwin, located at 121 Mitchell Street and 12 Doctors Gully Road, Darwin City. Both parcels are owned by YWCA Australia. The site has frontages to Mitchell Street (**Image 1**) and Doctors Gully Road (**Image 2**). Lot 5727 is developed with a two-storey building which previously operated as the Banyan View Lodge (a hostel) and was closed in 2019. Lot 3494 is developed with an elevated dwelling-single.



Image 1: Mitchell Street Frontage



Image 2: Doctors Gully Road Frontage

The site is constrained by a 3 metre wide sewerage easement which runs through Lot 5727 mostly parallel to Mitchell Street (**Figure 2**). Preliminary site servicing investigations have confirmed that the existing DN150 gravity sewer main within the easement was decommissioned in 2016, with the decommissioned section diverted to run adjacent the southeastern property boundary. The existing sewerage easement shown in **Figure 2** above is no longer required, and will be replaced with a new 3 metre wide easement along the southeastern boundary.



Figure 2: Existing easement across 5727

2.2 Locality

Figures 3 and 4 demonstrate the zoning layout within the immediate and broader localities. The site is located on the edge of the Larrakeyah, north-west of the Darwin Central Business District boundary, defined by the CB Zone.



Figure 3: Subject land and immediate locality

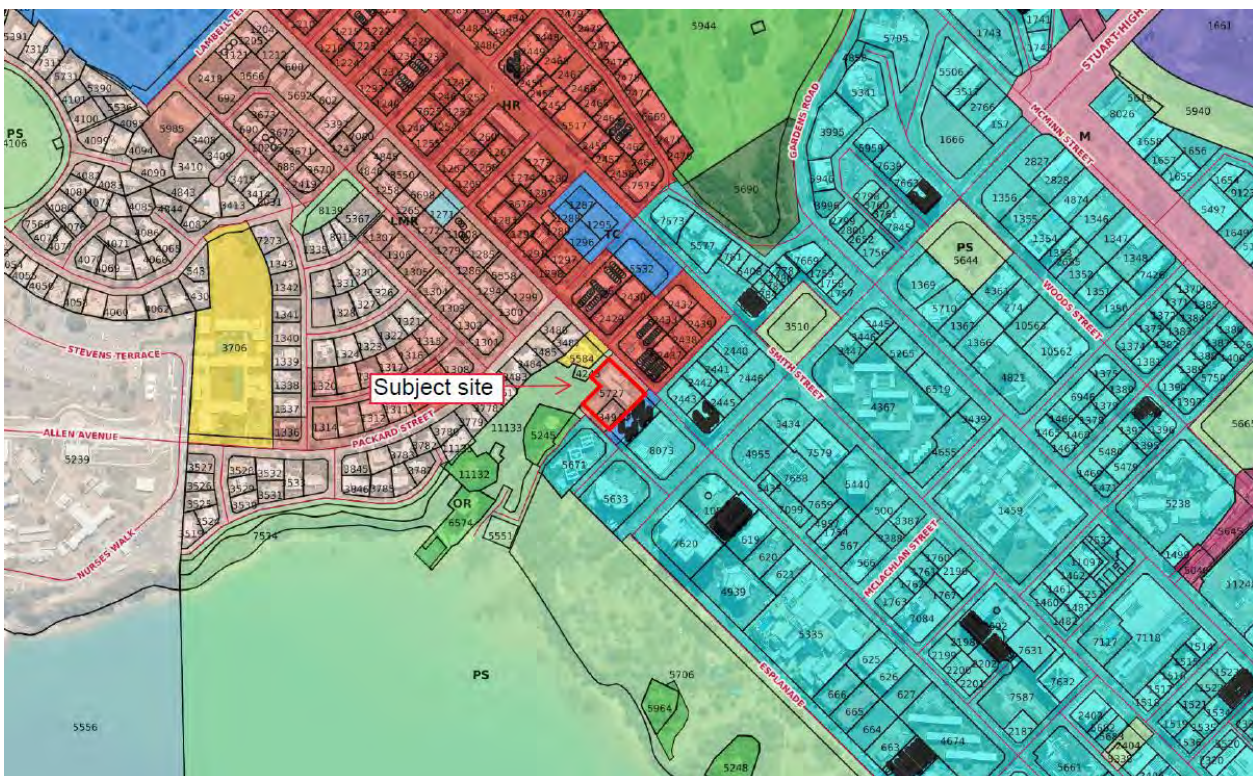


Figure 4: Broader Locality and Zoning

The subject land is located on the north-western CBD fringe, just on the Larrakeyah side of the boundary between the suburb of Larrakeyah and the Darwin CBD.

The immediate locality comprises a range of zones and corresponding land uses, reflecting the city fringe location of the site. Existing zoning includes Central Business, Low-Medium, Medium and High Density Residential, Public Open Space, Organised Recreation, Tourist Commercial and Community Purpose. Land to the northeast, on the opposite side of Mitchell Street, is Zoned HR (High Density Residential) with existing development including 7-storey residential apartment towers (**Image 3**). Land abutting the site to the northwest (Lot 4243) is within Zone PS (Public Open Space) and is developed as a car parking area for the adjacent childcare centre (Lot 5584 – Zone CP) (**Image 4**). Land directly to the east (Lot 11133) is also within Zone PS and comprises the Doctors Gully escarpment. Land to the south (Lot 5671) is within Zone CB (Central Business) and is developed with a 3-storey hostel (the YMCA). Land to the west (Lot 9121) is within Zone TC (Tourist Commercial) and is developed with a 9-storey apartment tower known as the Catalina Apartments (evident in **Image 1**). There are bus stops located directly in front of the site on both sides of Mitchell Street.



Image 3: Mitchell Street High Density Residential Development (North East of the Site)



Image 4: Lot 4243 Carpark

3.0 Planning History

Title documents for both allotments do not identify any planning history directly relevant to the proposed Planning Scheme Amendment.

4.0 Section 12A(2) of the Act

Section **12A(2)** of the Act requires that a request to amend the Scheme be in writing and include:

- a) an explanation of the proposed amendment;*
- b) a statement of the purpose of the proposed amendment and its desired effect;*
- c) an assessment of the proposed amendment with respect to the matters to be considered by the Minister under section 13(1);*
- d) the details of any community consultation conducted, or to be conducted, in addition to the consultation required under this Act.*

These matters are considered herein.

4.1 Section 12(A)(2)(a) – Explanation of the Proposed Amendment

The primary purpose of the proposed Planning Scheme Amendment is to rezone the subject land from LMR to a Specific Use Zone. There are two secondary elements which are also proposed to be amended, namely the inclusion of the specific use zone (refer proposed zone in **Attachment A**) into **Schedule 4** of the Planning Scheme; and amending the Central Darwin Area Plan to reflect the intended residential land use (rather than the intended tourist commercial use/s identified in the CDAP). The proposed specific use zone has been primarily based on the High Density Residential (HR) Zone, per **Clause 4.5** of the Planning Scheme, however modified to apply specific car parking requirements to, and allow the inclusion of ancillary administration space within a social and affordable housing development. The proposed specific use zone will facilitate the YWCA's proposed development of an integrated affordable and community housing facility providing long-term housing for women victim-survivors of family and domestic violence. The proposed specific use zone:

- Outlines a specific Zone Purpose statement that is consistent with the intended purpose of Zone HR (per **Clause 4.5**) and notes the application of specific (reduced) car parking requirements for housing managed by a registered community housing provider. The zone also notes that a community housing provide means an entity registered under the *Community Housing Providers (National Uniform Legislation) Act 2013* as a Community Housing Provider. The purpose statement and intended reliance on Zone HR seeks to ensure the zone outcomes and subsequent development in response to the location of the land and, whilst recognising social and affordable housing within the zone purpose, is sufficiently flexible to accommodate unrestricted residential development in accordance with Zone HR;
- Provides Administration Clauses to clearly outline:
 - The land to which the specific use zone applies (limited to lots 5727 and 3494 only);
 - That the use and development of land within the specific use zone, together with the applicable general, location-specific and development-specific requirements of the Planning Scheme, are to be applied as if the land were in Zone HR, except where varied within the specific use zone. Through administration subclauses 2 and 3, the specific use zone seeks to ensure land use and development outcomes consistent with Zone HR and thus compatible with the surrounding locality, noting the adjacent development to the south-east, existing development to the south, and predominance of Zone HR Zoned lots on the north-eastern side of Mitchell Street. The reliance on Zone HR to form the fundamental basis for building design and site layout in the Specific Use Zone will apply to building heights, setbacks, the provision of landscaping and communal open space, front fencing and building design, among a number of other general and specific development criteria. The achievement of building outcomes consistent with that anticipated in Zone HR also ensures development outcomes consistent with, indeed potentially less impactful than, the intended TC Zoning per the Central Darwin Area Plan, noting that Zone TC is a higher-intensity zone than HR. Zone TC is not subject to the height limits, fencing design requirements or

residential plot ratio limitations (other than for *rooming accommodation*) that apply to residential development in Zone HR, and allows reduced boundary setbacks for buildings above 4 storeys in height.

In addition to the reliance on the Zone HR land use and development criteria, subclauses 2, 3 and 6 also ensure an applicable framework for other forms of development (other than that proposed by the YWCA) in accordance with Zone HR, without having to specify additional land use and development criteria within the Specific Use Zone. This will ensure future adaptability of the land in the event that the YWCA vacates the premises at some stage in the future, in a manner that is consistent with other forms of development in Zone HR;

- Provides specific car parking criteria for social and affordable housing to reflect the lower car parking demand for specific housing types, and the proximity of the site to the Darwin CB Zone (proposed subclause 7).

The reduced car parking requirement applies to housing (in the form of *dwelling-groups* and *dwelling-multiple*) provided and managed by a registered Community Housing Provider only, and other forms of development identified in the Zone HR Assessment Table will be subject to consideration against **Clause 5.2.4**. Detailed consideration of the proposed car parking rates for social and affordable housing are provided in **Section 4.1.1** below. The reliance on **Clause 5.2.4.1** for the applicable car parking requirements for other development extends to the administration subclauses, which guide applicants, the community and the consent authority on the consideration of variations to the specific car parking requirements within the clause; and

- Includes the allowance for an *office* to be established providing it is (and remains) ancillary to the primary use for the purpose of housing by a registered Community Housing Provider and is limited to a maximum of 100m². Whilst **Clause 1.9(1c)** of the Planning Scheme would potentially allow the establishment of an ancillary *office*, proposed subclause 8 provides greater clarity as to the expected development outcomes within the specific use zone, and sets a clear floor area limit for an ancillary administration area.

4.1.1 Required Car Parking for Social and Affordable Housing

Currently the Northern Territory Planning Scheme does not recognise social and affordable housing as distinct from other forms of residential development. There are a number of areas of the Planning Scheme that should apply equally between social and affordable housing, and other, 'unrestricted' forms of residential development, for example site and building layouts, private open space, setbacks and heights. Conversely, there are a number of other requirements in the Planning Scheme that will apply differently given the unique nature of social and affordable housing, including the manner in which it's occupied, the occupants and the integrated and managed nature of the

intended accommodation. Critically, the demand for car parking in an integrated social and affordable housing facility provided and managed by a registered Community Housing Provider is considered to be well below the required provision in **Clause 5.2.4.1** of the Planning Scheme (which requires 2 spaces per dwelling).

The current Planning Scheme rate does not recognise the following:

- The intended occupation of the dwellings for social and affordable housing for women victim-survivors of family and domestic violence, particularly those transitioning from emergency or short-term supported accommodation;
- The integrated and managed nature of the proposed housing which, in the case of the intended development, will be undertaken by the YWCA.

The proposed restriction in subclause 7 of the Specific Use Zone ensures that, for the specific car parking rate to be applied, the dwellings must be provided *and* managed by the YWCA or a similar organisation;

- The proportion of 1-bedroom dwellings within the proposed development and the corresponding physical constraints on occupation and ownership; and
- The proximity of the subject land to the Darwin Central Business District (less than 30 metres at the nearest point to the commencement of Zone CB – Central Business, and less than 140 metres to land on the south-eastern side of Daly Street), noting the applicable car parking requirement on land in Zone CB (commencing less than 30 metres from the subject land) is significantly lower than that which is / would be applicable to the site under **Clause 5.2.4.1**.

The Darwin CB Zone

In relation to this final point above, **Clause 5.2.4.1** applies a car parking requirement of 2 spaces per dwelling (irrespective of the above characteristics), whereas **Clause 5.9.1.11** (*Car Parking Spaces in Darwin City Centre*) requires:

- 1 parking space per bed-sit or 1-bedroom dwelling;
- 1.5 spaces per 2-bedroom dwelling; and
- 1.7 spaces per 3-bedroom dwelling.

Logically, the proximity of the subject land to the CBD, the level of services and facilities therein (including community and government services, commercial land uses and entertainment), the walkability to and within the CBD, and the increased proximity to and availability of public transport, all significantly increase alternative transport opportunities and reduce the reliance on private motor vehicle use and car parking.

This is particularly pertinent when comparing the subject land to other residential land also subject to **Clause 5.2.4.1** and the requirement to provide 2 car parking spaces per dwelling. That is to say, the subject land is unique in its immediate proximity to the Darwin CBD, even compared to the majority of HR Zone lots in the broader locality.

In addition to the lower parking rates required by **Clause 5.9.2.11**, the location of the subject land would also likely apply further parking reductions were the land zoned CB, under **Clause 5.9.2.12** (Reduction in car parking spaces in Darwin City Centre) as:

- *The development is located within 200m of a dedicated off-road bicycle path or on-road bicycle lane (The Esplanade Path extending from the end of Doctors Gully Road, approximately 70 metres from the subject land).*

Accordingly, it is reasonable to assume the Darwin CB rates (per **Clause 5.9.11**) as the basis to then determine the applicable rate specifically for *social and affordable housing*.

Social and Affordable Housing – Case Studies

A number of planning jurisdictions apply specific design criteria for affordable housing due to the different demand for ancillary components (for example car parking) or as an incentive to developers to increase the provision of affordable housing as part of private developments (for example increased building heights or dwelling yields). As they relate to car parking, examples include:

- Victorian Planning Scheme **Clause 52.20-6.7** and **53.20-6.9** applying a requirement of **0.6** parking spaces for each social and affordable dwelling provided through the “Big Housing Program.”
- SA Planning and Design Code – Affordable Housing Overlay **Performance Outcome 4.1** and **Deem to Satisfy Criteria / Designated Performance Feature** stipulating a provision of **0.3** parking spaces per dwelling within a specified distance of certain forms of public transport or public open space, or **1** car park per dwelling in all other cases.

Whilst these rates provide a useful insight into the specific approach taken by other jurisdictions, it is of limited direct relevance in the Northern Territory context. More relevant is a comparison of the proportionate reduction in demand for car parking for affordable housing relative to unrestricted housing. Again utilising the SA Planning and Design Code, residential flat buildings (the comparable definition to *dwelling-multiple*) where not applying the affordable housing overlay require:

- 1 car parking space for 1 and 2-bedroom dwellings;
- 2 car parking spaces for 3+ bedrooms; and
- 0.33 spaces per dwelling for visitor parking.

Compared to the rates applied through the affordable housing overlay this results in:

- Between 0% and 70% reduction for affordable 1 and 2-bedroom dwellings depending on accessibility to public transport;
- Between 50% and 85% reduction for affordable 3-bedroom dwellings depending on accessibility to public transport; and
- No visitor parking criteria for affordable housing.

For the rate of 0.3 parking spaces per dwelling under the SA Planning and Design Code – Affordable Housing Overlay to apply to affordable housing, the dwellings must be within:

- 200 metres of any section of road reserve along which a bus service operates as a high frequency public transit service*
- 400 metres of a bus interchange*
- 400 metres of an O-Bahn interchange*
- 400 metres of a passenger rail station*
- 400 metres of a passenger tram station*
- is within 400 metres of the Adelaide Parklands.*

The Code defines a *high frequency public transit service* as a route serviced every 15 minutes between 7:30am and 6:30pm Monday to Friday and every 30 minutes at night, Saturday, Sunday and public holidays until 10:00pm. The required frequency thresholds are more frequent (albeit not significantly) than that provided by bus route 4 which runs along Mitchell Street with bus stop 73 located immediately adjacent the site. As such, point i) above is not met, and points ii) through v) are not applicable. The subject land is within 400 metres of the Darwin Esplanade / Bicentennial Park, a large and regionally significant area of public open space.

Based on the above, and as a useful guide to the local context, the proximity of public transport services and public open space are likely to apply to reduce motor vehicle demand to some extent, although not to the extent recognized in the South Australian policy (ie a reduction of 70% / 85% for one and two bedroom / three bedroom dwellings).

Further research uncovered analysis by David Graham, Senior Principal Transport Engineer with Stantec Australia Pty Ltd as part of a Transport Engineering Impact Review of a residential and retail development project being considered by the Victorian Civil and Administrative Tribunal in May 2023.

The Summary provided:

“As previously indicated, all of the apartments in the amended development proposal will be used for social and affordable housing. None of the apartments will be sold or let on a commercial basis at market rates.

Research indicates that car parking demand rates for social housing are typically lower than those for commercial housing. Indeed, a large study undertaken by Stantec (formerly GTA) in 2017 for the Department of Health & Human Services found an average car ownership rate of 0.64 vehicles per dwelling for social housing sites in the City of Merri-bek, and an average of 0.39 vehicles per dwelling for social housing sites in the middle metro areas as a whole. The surveys also found that car ownership rates were lower for residents of apartments than those in stand-alone houses, and that car ownership rates were lower for one-bedroom dwellings than for dwellings with two or more bedrooms.

Given that the proposed development is an apartment building, with a high percentage of one-bedroom dwellings, and is located adjacent to a tram line and within easy walking distance of a train station, it is likely to have lower than typical car ownership rates. Notwithstanding, conservatively adopting the average surveyed rate for social housing in Merri-bek of 0.64 vehicles per dwelling, the development could generate demand for up to 94 resident car parking spaces.”¹

Whilst the study referenced in the report could not be located, the corresponding parking rates for ‘unrestricted’ apartment dwellings were 1 space for one- or two-bedroom dwellings, and 2 spaces for three-bedroom dwellings. Utilising the average rate of 0.64 for social housing sites in the City of Merri-bek, this equates to a reduction of 36% for one and two bedroom dwellings, and 68% for two bedroom dwellings.

Social and Affordable Housing - Proposed

Based on the above, the reductions in car parking rates between social and affordable housing relative to unrestricted housing have been observed as follows:

- 0% for 1 and 2-bed dwellings in SA outside of specified proximity to public transport and open space (1:1);
- 36% for 1 and 2-bed dwellings in Merri-bek study (0.64:1);
- 50% for 3-bed dwellings in SA outside of specified proximity to public transport and open space (1:2);
- 68% for 3-bed dwellings in Merri-bek study (0.64:2);

¹ Graham, D. (2023) *Proposed Amended Development – Transport Engineering Impact Review*, Melbourne, Victoria; Stantec Australia Pty Ltd; obtained from Merri-bek City Council Website accessed 2 October 2023

- 70% for 1 and 2-bed dwellings in SA within specified proximity to public transport or open space (0.3:1); and
- 85% for 3-bed dwellings in SA within specified proximity to public transport or open space (0.3:2).

For the development of *social and affordable housing* on the subject land, a conservative reduction of **30%** has been applied to the Darwin CB rates for *social and affordable housing* only, on the basis of:

- Immediate proximity to the Darwin CBD;
- Proximity to public transport and public open space; and
- Land use and development control imposed by the Specific Use Zone, particularly the definition of *social and affordable housing*.

The following rates are proposed in subclause 7 of the proposed Specific Use Zone:

Table to Clause 7: Minimum number of Car Parking Spaces Required for housing provided by a registered Community Housing Provider	
Use or Development	Minimum number of Car Parking Spaces Required
Dwelling-group and Dwelling-multiple	0.7 per one bedroom <i>dwelling</i> 1.05 per two bedroom <i>dwelling</i> 1.19 per three bedroom <i>dwelling</i> <u>Plus</u> 2 for every 100m ² of net floor are used for administrative purposes

For the specific parking rate to apply, dwellings must be provided and managed by a community housing provider registered under the *Community Housing Providers (National Uniform Legislation) Act 2013*.

In accordance with the Specific Use Zone, if the dwellings no longer fit this criteria, car parking will need to be considered against **Clause 5.2.4.1** of the Planning Scheme.

4.2 Section 12A(2)(b) – Purpose and Effect of Amendment

The site is owned by YWCA which provides housing and support services for women and their families. YWCA is a registered Community Housing Organisation through the National Regulatory System for Community Housing (NRSCH) and is the only national women’s community housing organisation.

The purpose of the proposed Amendment is to facilitate the development of an integrated social and affordable housing facility on a site located in immediate proximity to the Darwin CBD, public transport services and public open space. The intended development will be consistent with the broad definition of *dwelling-multiple* under **Schedule 2** of the Scheme:

dwelling-multiple means a dwelling or serviced apartment that is wholly or partially vertically over or under another dwelling on a site or any dwellings above the ground floor in a mixed use development, and includes a dwelling on a unit title with common property.

As the *dwelling-multiple* definition is a broad residential land use definition that does not limit or otherwise restrict the nature of occupation, the specific use zone ensures the specific car parking criteria applicable to social and affordable housing is limited thereto, and that any future unrestricted residential use or development will be subject to the applicable requirements of the Planning Scheme.

In effect, the amendment will facilitate the development and use of the subject land for:

- Managed social and affordable housing generally subject to the spatial and built form requirements applicable to residential development in Zone HR, with specific car parking and ancillary use criteria reflecting the unique nature of social and affordable housing; and/or
- Land uses identified in the Assessment Table to **Clause 4.5** – Zone HR.

The reliance on Zone HR will apply suitable land use and development controls to ensure compatibility with surrounding zones, existing development and development reasonably anticipated, and provide for development outcomes similar to that identified in the strategic framework, notwithstanding the proposed amendment to the Area Plan.

4.3 Section 12A(2)(c) – Relevant Matters under Section 13(1)

Section 13(1) of the Act requires the Minister to consider the following when considering a request to amend the Planning Scheme.

4.3.1 Section 13(1)(a) - whether the proposed amendment promotes the purpose and objectives of this Act

Section 2A provides the purpose and objectives of the Act. There are a number of elements of the proposed amendment and resultant intended development that promote the purpose and objectives of the Act. The proposed amendment ensures an orderly integration and progression of zoning and subsequently development in a manner that aligns appropriate urban development zones and provides a suitable land use within a mixed inner urban area. The proposed zone will limit unique development requirements to those directly applicable to the specific nature of

social and affordable housing, whilst the reliance on an existing zone for other development and use ensures consistency and flexibility for development / land use should the site need to transition in the future. The intended Specific Use Zone respects existing and reasonably anticipated development on surrounding land, particularly noting the more stringent setback (above 4 storeys) and height requirements for development in Zone HR relative to the TC Zone identified in the Area Plan.

A separate statutory process (development application) and the corresponding reliance on the relevant design and land use provisions of the Planning Scheme (and, where varied, the specific use zone) in the consideration of any future development will ensure positive site and building design outcomes that respect the amenity of the locality. The amendment will enable the use and development of the land in a manner which is sustainable and will not impact on natural environmental or ecological processes.

As it directly relates to the objects in **Section 2A**, the proposal:

- Is an appropriate transition of zoning under the Darwin Regional Land Use Plan, noting the identification of the subject land for *Tourist Commercial* in the Area Plan, and the intended zone ensures built form and land use outcomes (residential) similar to that possible in Zone TC. (refer **Section 4.3.2** for consideration of the Strategic Framework);
- Is consistent with the NT Compact Urban Growth Policy and Darwin Regional Land Use Plan (relevant strategic framework policy);
- Will facilitate the development of social and affordable housing to support the needs of the community;
- Facilitates a statutory planning approval process subject to the relevant design and land use provisions of the Planning Scheme to ensure the good design of buildings in a manner that respects the amenity of the locality;
- Promotes the sustainable development of land in an urban, walkable locality proximate to public transport; and
- Will facilitate a building envelope consistent with development in the immediate locality with a height limitation below that currently envisaged by the Central Darwin Area Plan.

4.3.2 Section 13(1)(b) - whether the proposed amendment, other than a proposed amendment to a strategic framework, is contrary to any strategic framework in the planning scheme

The proposed amendment includes an amendment to the Central Darwin Area Plan, being part of the strategic framework applicable to the subject land. The Northern Territory Compact Urban Growth Policy, Darwin Regional Land Use Plan and Central Darwin Area Plan form the strategic framework applicable to this site.

NT Compact Urban Growth Policy

The NT Compact Urban Growth Policy (CUGP) was introduced in 2015 as a policy document. It applies to higher density residential proposals in urban brownfield and greenfield localities throughout the Northern Territory. The Policy is used to assess the appropriateness of delivering higher density residential land uses, including rezoning applications where higher density residential land uses are proposed, and provides a set of guiding contemporary planning principles for considering an increase to the allowable density of a site.

4.1 Accessibility	
<p>Objective:</p> <p>To allow for higher density residential proposals that are within a comfortable walking distance of: (a) an activity centre where commercial and community facilities are available; and (b) a public transport route (applicable in regions where public transport services are available)</p>	<p>Key Performance Indicators:</p> <ol style="list-style-type: none"> 1. Is the proposal within 400 metres walking distance of the following: (a) an activity centre; (b) frequent public transport; (c) public open space; and (d) schools and other education/ community facilities? 2. Do local walking and cycling routes allow for direct, quick and safe access to public transport, commercial and community facilities?
<p>Response:</p> <p>The site is located within 400m walking distance of the Darwin CBD, being the major regional activity centre within the Top End of the Northern Territory. The site is directly adjacent bus route 4, with frequent services during peak times providing access to the CBD, Charles Darwin University, Casuarina, Alawa, Rapid Creek, Nightcliff and Fannie Bay. An existing childcare centre is located immediately adjacent the site, with the Larrakeyah Primary School approximately 550m walking distance. PS (Public Open Space) land in Doctors Gully is immediately adjacent the site, with formal public open space areas in Bicentennial Park commencing within 120m walking distance. The</p>	

site allows direct access to the on-street shared path / footpath network connecting to public transport, open space, commercial and community facilities.

4.2 Neighbourhood Character

Objective:

To encourage higher density residential proposals that: (a) positively respond to the established neighbourhood character; (b) integrate positively with neighbouring lower density localities; (c) positively contribute to the values of neighbouring heritage sites; and (d) are consistent with the current or future envisaged pattern of urban development within the locality;

Key Performance Indicators:

1. Will the proposal positively contribute to the neighbourhood character by: (a) providing development outcomes consistent with the existing building height and building type in the neighbourhood, or a building height and building type envisaged by an Area Plan or Policy within the NT Planning Scheme; (b) improving the neighbourhood aesthetic through landscaped setbacks and/ or active frontages; and (c) ensuring that heritage places are not dominated or diminished in appearance?
2. Is the proposal continuing an existing town planning zoning sequence or is it consistent with a future development vision outlined by an Area Plan or Policy within the NT Planning Scheme?
3. Is the proposal providing a transition in density, height, bulk and massing where lower density localities are adjacent or adjoining?

Response:

The proposed amendment will facilitate a building height (up to 8 storeys) and type (dwelling-multiple) consistent with existing buildings in Zones HR, CB and TC in the immediate locality, including land immediately adjacent the subject site. Built form outcomes under the proposed specific use zone are consistent (or below) the TC Zone anticipated in the strategic framework, with applicable setback and landscaping requirements for Zone HR ensuring improvements to site appearance and neighbourhood aesthetic. The proposed zone ensures a continuation of built form and density outcomes from the adjacent TC zone and HR Zone opposite. Given the applied HR Zone parameters relative to the anticipated TC Zone and existing development in the locality, the proposed amendment will not result in any incompatible bulking or massing.

4.3 Traffic Management

Objective:

To ensure that higher density residential proposals do not cause

Key Performance Indicators:

1. Can the existing road network support the proposed density increase (ie. is it likely that the development will result in road intersection failure)?

<p>a detrimental impact on vehicle movement.</p>	<p>2. Is the road reservation adjoining the proposal wide enough to cater for on street car parking and vehicle movement? Higher density residential development is not encouraged: (a) in cul-de-sacs; and (b) on road reserves less than 17 metres in width for lower and medium density developments; or (c) on road reserves less than 20 metres in width for high densities.</p>
<p>The site has a relatively wide frontage to both Mitchell Street and Doctors Gully Road which provides opportunity for vehicle access and on-street parking to either road frontage. The dual frontages provide a range of options for vehicle and pedestrian access to minimise potential conflict with existing accesses, public infrastructure and transport networks. Given the density and intensity of surrounding development and the function of the road network, it is expected that the existing road network will support resultant development. The Mitchell Street road reserve exceeds 20 metres, whilst the Doctors Gully road reserve is less than 17 metres.</p>	
<p>4.4 Service Infrastructure</p>	
<p>Objective:</p> <p>To ensure that higher density residential proposals do not cause a detrimental impact on the operation of essential power, water, sewerage and stormwater infrastructure.</p>	<p>Key Performance Indicators:</p> <p>1. Have the relevant service authorities indicated that power, water, sewerage and stormwater infrastructure: (a) currently exists to adequately cater for the increase in density; or (b) will be provided to a level that will support the envisaged change in population?</p> <p>2. Is reticulated sewerage infrastructure available within the locality? Higher density residential proposals are only encouraged where reticulated sewerage services are available.</p>
<p>A service infrastructure review undertaken by Muir Consultants determined:</p> <ul style="list-style-type: none"> • The existing site drainage regime to Doctors Gully would be retained for future development, providing for near-direct discharge to the end-of-line receiving environment; • Sufficient potable water connection from the existing DN225 water main in Mitchell Street and/or the existing DN100 reticulation main in Doctors Gully Road; • The existing DN150 sewer main extending through the easement within the central portion of the site was decommissioned in 2016 and is no longer required, thus (subject to redundant infrastructure removal) presents no impediment to development; 	

- Future development will connect via a Type 1 sewer service to the existing PWC access chamber along the southeastern boundary of the site;
- An indoor electrical substation (anticipated 750kVA distribution transformer) will be required to connect to the existing high voltage overhead power line on the northeastern side of Mitchell Street, and/or 11kV underground power along Doctors Gully Road.

Accordingly, sufficient service capacity is available to support development resulting from the proposed amendment.

4.5 Constrained Land

Objective:

To discourage higher density residential proposals in localities that are affected by noise, public health or public safety constraints.

Key Performance Indicators:

1. Is the proposal affected by any constraint where higher residential densities are discouraged? For example, higher densities are discouraged on land affected by the following constraints: (a) Australian Noise Exposure Forecast Contours relating to aircraft noise; (b) Primary or Secondary Storm Surge Areas; (c) odour buffers relating to sewerage infrastructure; (d) biting insects in greenfield developments; and (e) riverine flooding in greenfield development.
2. Is the proposal in accordance with the airport building height limitations applied by: (a) Defence (Area Controls) Regulations 1989; (b) Airports (Protection of Airspace) Regulations 1996: Obstacle Limitation Surface; and (c) Airports (Protection of Airspace) Regulations 1996: Procedures for Air Navigation Services – Aircraft Operations?

Response:

The site is not subject to any identified noise, storm surge or flooding, public health or public safety constraints. The proposal will result in a maximum building height well below operational or Defence height limitations imposed by the Darwin Airport or RAAF Base Darwin.

4.6 Social Infrastructure

Objective:

To ensure that higher density residential proposals respond

Key Performance Indicators:

1. Where a proposal involves a land area greater than 1 hectare, is the social infrastructure (ie. park facilities, community centres etc.) of an adequate standard to cater for the estimated increase in population? Or,

<p>appropriately to the social infrastructure needs of a locality.</p>	<p>will further embellishment, planning for or the provision of new facilities be required?</p> <p>2. Will the redevelopment of a site designated for community purposes result in an unacceptable impact on the provision of social infrastructure in a locality?</p>
<p>Response:</p> <p>The subject site is less than 1ha in area, the proposed development will not unreasonably impact on the provision of any social infrastructure in the locality and the subject land has not been previously designated for community services.</p>	

Darwin Regional Land Use Plan (DRLUP)

The Darwin Regional Land Use Plan was prepared by the Northern Territory Planning Commission and incorporated into the Northern Territory Planning Scheme as a policy document in 2015. The plan provides a vision, goals and intended outcomes for development of the Darwin Region, identifies regional opportunities and the intention for development into the medium and long term. The Land Use Structure on Page 13 of the Plan identifies the subject land as *Urban / Peri-Urban*.

Page 16 of the Plan identifies Urban / Peri-Urban to include:

- A variety of housing types;
- Retail and commercial;
- Community facilities and services;
- Sport, recreation and urban open space; and
- Natural and conservation areas.

Commencing on page 12, the Plan deals with residential land uses and development, and provides the following key residential objectives:

- Integrate new and existing residential development to maintain character and create a cohesive society that meets the diverse needs and aspirations of all sectors of the community.

- Ensure sustainable development by encouraging: the efficient use of land, water, energy and other resources
 - accessible and efficient public transport to reduce transport demands
 - cost effective provision and efficient utilisation of infrastructure and services
 - development that is consistent with the community's economic, social, cultural and environmental values
 - the creation of character and identity
 - opportunities for community initiatives that support happier, healthier and inclusive communities

The proposed zone will facilitate development in a manner that will provide an appropriate increase in density whilst constraining the height of development to provide a transition from the CB and TC Zones to the high, medium and low-density areas of Larrakeyah. The zone will ensure future development diversifies residential offerings to a broader range of community sectors, has access to public transport, can integrate with infrastructure and services and takes advantage of the proximity and walkability to the CBD. The rezoning will facilitate urban development in a manner consistent with the Regional Land Use Plan, with the Northern Territory Planning Scheme requiring resultant development, amenity, design and use outcomes appropriately consider the surrounding locality.

The specific Urban and Peri-Urban Residential Objectives commencing on Page 15 seek to ensure the provision of a sufficient supply of residential development to provide a range of dwelling types within (or close to) established areas. The Land Use Plan supports infill residential development on underutilised land close to existing transport networks and community or commercial facilities. The subject land is close to public transport routes, collector roads with separate walking and cycling facilities, and community uses such as the Larrakeyah Primary School and Bicentennial Park. The proximity of the site to the Darwin CBD enables improved access to broader public transport services for commuters, and close proximity to employment centres, administrative, commercial, recreation and community facilities.

Central Darwin Area Plan (CDAP)

The Central Darwin Area Plan was finalised by the Northern Territory Planning Commission and incorporated as a policy document in the Planning Scheme in late 2019. The Plan provides a framework for land use and development outcomes within the Central Darwin Area (ie Cullen Bay to the Darwin Waterfront), whilst recognising the importance of historic and culturally significant places, including approaches to preserve and revitalise such places so that they continue to be enjoyed by the Darwin community.

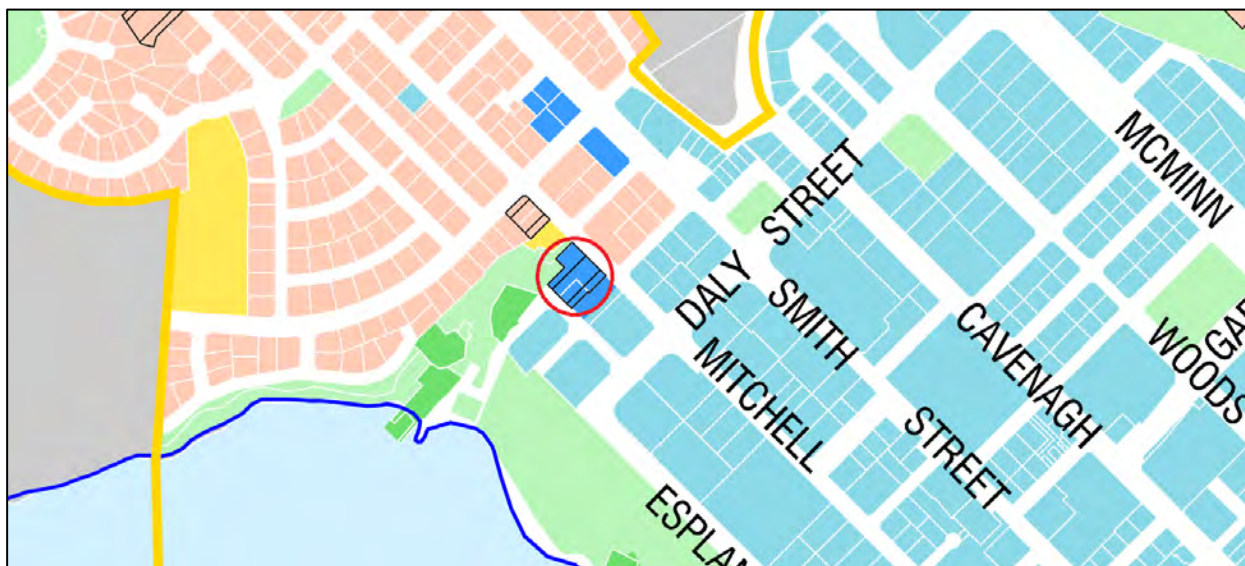


Figure 5: Subject land (circled) per the Central Darwin Area Plan Land Use Vision Map

The current zoning map on page 10 of the Area Plan reflects the existing Low-Medium Density zoning, whilst the Land Use Vision Map on page 13 of the Plan (**Figure 5**) identifies the site as Potential Area for Change, with the underlying intended land use being Tourist Commercial. It is understood that this land use was identified largely based on submissions made on behalf of YWCA to the Northern Territory Planning Commission in 2019 during consultation periods for the Area Plan.

The submissions state an intent to rezone the land to Zone TC (Tourist Commercial) based on the flexibility of the zoning to provide for both commercial and residential development on the subject land. Further, Zone TC enabled the YWCA to sell the land to a private operator, such as a hotelier, to fulfill its highest and best use at the time.

It should be noted that these submissions were made when the land was subject to the former 2007 Planning Scheme. Since then, the current 2020 Planning Scheme has been introduced, which includes more detailed zone outcomes, new assessment categories and revised administration requirements for the zone purpose statements.

Given the increasing need for social and affordable housing in the Darwin Area, the YWCA is now pursuing the development of the land for this purpose, which differs from the development aspirations identified in the Central Darwin Area Plan. Under Zone TC, a *dwelling-multiple* development is Impact Assessable. Zone **Outcome 2** in **Clause 4.13** seeks to limit residential development such that the nature of the activity does not compromise the primary use of the locality for tourist commercial activities. Development of the subject land for *dwelling-multiple*, in the form of social and affordable housing, is likely to form part of the *primary* use of Zone TC in the locality (which would consist of the subject lots together with lot 9121 to the southeast). Clearly Zone **Outcome 2** anticipates residential uses that aren't directly related to tourism are subservient or lower in rank, prevalence or size relative to tourism-related uses (whilst not to the extent of *ancillary*).

The development of the subject land for social and affordable housing as intended could not be said to be subservient, lower in rank, prevalence or size relative to tourism-related uses in the immediate locality, and thus could be inconsistent with **Clause 4.13** were lots 5727 and 3494 zoned TC. Accordingly, the proposed amendment seeks to change the intended development direction identified in the Area Plan from Tourist Commercial to Residential.

The proposed amendment is consistent with the purpose of the Area Plan in catering for the needs of the future population by recognising the role Larrakeyah plays in providing housing diversity in close proximity to the city centre.

4.3.3 Section 13(1)(c) - whether the proposed amendment is within a declared class of amendments that do not require exhibition

The proposed amendment is not within a declared class of amendments that do not require exhibition.

4.3.4 Section 13(1)(d) - whether the proposed amendment is not significant enough to require exhibition

It is expected that the proposed amendment will require exhibition.

4.3.5 Section 13(1)(e) - the merits of the proposed amendment and whether the amendment is in the public interest

The proposed amendment will facilitate the future residential development of the land consistent with the Compact Urban Growth Policy. Notably, in comparison to the intended development outcomes identified in the Area Plan, the proposed amendment will increase the constraints on height and density of future development and will accordingly ensure it is appropriate in the context of the existing locality.

The proposal will support the development of social and affordable housing and is therefore considered to be in the public interest.

4.3.5 Section 13(1)(f) - any report from the Planning Commission under section 12B(3)

Any report from the Planning Commission will be provided at the Ministers request (made under **Section 12B(1)**) and will (if requested) provide the Commission's views on the strategic planning implications of the proposed amendment.

4.3.6 Section 13(1)(g) any other matters the Minister considers appropriate

The proponent does not submit any other matters for consideration by the Minister at this stage.

4.4 Section 12A(2)(d) – Community Consultation

The YWCA has engaged directly with the following agencies:

- Northern Territory Government Department of Lands, Planning and Environment – Development Assessment Services and Lands Planning;
- Northern Territory Government Department of Housing, Local Government and Community Development;
- City of Darwin; and
- Power and Water Corporation – Services Development and Distribution Development.

YWCA engaged True North Strategic Communication to undertake a preliminary consultation program to understand initial views about the proposed rezoning. Consultation ran for 4 weeks from 19 February to 19 March 2025 and preceded the proposed Planning Scheme Amendment, including the proposed specific use zone, being finalised. Consultation focused on engaging with local residents, businesses and key community groups using various tools and tactics, such as fact sheets, telephone and email, face to face meetings and letterbox drops. True North developed an independent consultation report outlining the consultation findings, and identified and summarised key themes raised during consultation and YWCA’s commitment in response. The themes and commitments were provided back to respondents and are included in **Attachment D**.

5.0 Conclusion

The YWCA seeks the Minister’s consideration of this submission to amend the Northern Territory Planning to:

- Rezone the Subject land from Zone LMR to a specific use zone;
- Introduce a specific use zone into **Schedule 4** of the Planning Scheme applicable to the subject land only; and
- Amend the Central Darwin Area Plan to reflect the residential nature of the proposed zone.

The proposed amendment will facilitate redevelopment of the subject land to intended provide an integrated social and affordable housing complex owned and operated by the YWCA to improve the availability of long-term housing for women victim-survivors of family and domestic violence, particularly those transitioning from crisis accommodation.

The proposed zone will provide specific criteria applicable to the development of social and affordable housing, whilst retaining flexibility for the transition of future land use and/or development in accordance with Zone HR.

The proposed amendment will facilitate the development of high density housing (including social and affordable housing) in close proximity to the range of commercial, civic, community and recreational facilities in the Darwin CBD, with direct access to public transport services and in a manner compatible with existing and reasonably anticipated development in the surrounding locality.

The Amendment will protect the amenity of existing and future residential uses through its reliance on the relevant Planning Scheme requirements applicable to development in Zone HR, will increase the availability of community services (namely housing) in the Darwin region, and promote the intended land use and development outcomes in the Darwin Regional Land Use Plan. The proposed variation to the Central Darwin Area Plan is appropriate noting the similar built form parameters between Zones HR and TC, and the suitability of the subject land for high density housing.



Brad Cunnington

Cunnington Rosse Town Planning and Consulting

4.1.3.X SDX Lots 5727 and 3494 Town of Darwin (121 Mitchell Street and 12 Doctors Gully Road, Larrakeyah)

Purpose

Provide for development expected within Zone HR (High Density Residential), with reduced car parking requirements for housing provided and managed by a registered Community Housing Provider

Administration

1. This specific use zone applies to Lots 5727 and 3494 Town of Darwin.
2. The use and development of land subject to this specific use zone is to be in accordance with Zone HR.
3. General and specific development requirements for use and development defined in Schedule 2 are to be applied as if the land were in Zone HR (High Density Residential) unless otherwise varied by this Specific Use Zone for dwelling-group and dwelling-multiple provided and managed by a registered Community Housing Provider.
4. The consent authority must not consent to a development not in accordance with sub-clauses 7 and 8.

Zone Outcomes

5. Development that facilitates opportunities for **dwelling-group** and **dwelling-multiple** provided and managed by a registered Community Housing Provider that is responsive to the need and context of the local community.
6. Other forms of development in accordance with Zone HR outcomes.

Requirements

7. Where provided and managed by a registered Community Housing Provider, use and development for dwelling-group and dwelling-multiple is to include the minimum number of **car parking spaces** specified in the table to this clause (rounded up to the next whole number).
8. Where ancillary to dwelling-group and/or dwelling-multiple development provided and managed by a registered Community Housing Provider, an office may be established at ground level not exceeding 100m².

Table to Clause 7: Minimum number of Car Parking Spaces Required for housing provided by a registered Community Housing Provider

Use or Development	Minimum number of Car Parking Spaces Required
Dwelling-group and Dwelling-multiple	0.7 per one bedroom <i>dwelling</i> 1.05 per two bedroom <i>dwelling</i> 1.19 per three bedroom <i>dwelling</i> <u>Plus</u> 2 for every 100m ² of net floor area used for administrative purposes

Editor's Note: A community housing providers means an entity registered under the Community Housing Providers (National Uniform Legislation) Act 2013 as a community housing provider.

Date Registered: 08/11/2018

Volume 829 Folio 953

Duplicate Certificate as to Title issued? No

SEARCH CERTIFICATE

Lot 5727 Town of Darwin from plan(s) S 89/273

Area under title is 2760 square metres

Owner:

Young Women's Christian Association of Australia (ACN 111 663 873)
of Level 1, 210 Kings Way, South Melbourne Vic 3205

Registered Date	Dealing Number	Description
07/04/2016	867433	Previous title is Volume 809 Folio 873 Sewerage Easement to Power and Water Corporation
End of Dealings		



NORTHERN TERRITORY OF AUSTRALIA

Record of Administrative Interests and Information

Record of Administrative Interests and Information

The information contained in this record of Administrative Interests only relates to the below parcel reference.

Parcel Reference: Lot 05727 Town of Darwin plan(s) S 89/273

(See section 38 of the Land Title Act)

Note: The Record of Administrative Interests and Information is not part of the Land Register and is not guaranteed by the Northern Territory of Australia, and the NT Government accepts no Liability for any omission, misstatement or inaccuracy contained in this statement.

Registrar General

Government Land Register

(none found)

Custodian - Registrar General (+61 8 8999 6252)

Current Title

CUFT 829 953 (order 1)

Tenure Type

ESTATE IN FEE SIMPLE

Tenure Status

Current

Area Under Title

2760 square metres

Owners

Young Women's Christian Association of Australia (ACN 111 663 873)
Level 1, 210 Kings Way, South Melbourne Vic 3205

Easements

Sewerage Easement to Power and Water Corporation

Scheme Name

(none found)

Scheme Body Corporate Name

(none found)

Reserved Name(s)

(none found)

Unit Entitlements

(none found)

Transfers

08/11/2018 for Order

Tenure Comments

(none found)

Historic Titles

CUFT 809 873 (order 1)

CUFT 809 854 (order 1)

CUFT 753 230 (order 1)

CUFT 753 229 (order 1)

CUFT 278 083 (order 1)

CUFT 221 014 (order 1)

Visit the website http://www.nt.gov.au/justice/bdm/land_title_office/

Custodian - Surveyor General (+61 8 8995 5319)**Address**

121 MITCHELL ST, LARRAKEYAH

Survey Plan

S 89/273

Survey Status

Approved

Parcel Status

CURRENT

Parcel Area

2760 square metres

Map Reference

Code 200 Scale 2500 Sheet 29.22

Parent Parcels

Lot 03489 Town of Darwin plan(s) B 000064

Lot 03490 Town of Darwin plan(s) B 000064

Lot 03491 Town of Darwin plan(s) B 000064

Lot 03495 Town of Darwin plan(s) B 000064

Parcel Comments

CONSOLIDATION OF LOTS 3489 TO 3491 AND 3495 - S89/273.

Survey Comments

(none found)

Proposed Easements

(none found)

Municipality

DARWIN MUNICIPALITY

Region

DARWIN

Custodian - Valuer General (+61 8 8995 5375)

Owner's Last Known Address

Young Women's Christian Association of Australia (ACN 111 663 873), LEVEL 1, 210 KINGS WAY, SOUTH MELBOURNE VIC 3205

Parcels in Valuation

Lot 05727 Town of Darwin

Unimproved Capital Value

\$1,925,000 on 01/07/2017
\$1,925,000 on 01/07/2017
\$1,925,000 on 01/07/2017
\$1,925,000 on 01/07/2017
\$2,140,000 on 01/07/2014
\$2,485,000 on 01/07/2011
\$1,835,000 on 01/07/2008
\$1,109,000 on 01/07/2005
\$832,000 on 01/07/2002
\$740,000 on 01/07/1999
\$540,000 on 01/07/1996
\$450,000 on 01/07/1993
\$250,000 on 01/01/1991
\$155,000 on 01/01/1988

Valuation Improvements

17/07/1997 Hostel
20/12/1989 OTR

Custodian - Property Purchasing (+61 8 8999 6886)

Acquisitions

(none found)

Custodian - Building Advisory Service (+61 8 8999 8965)

Building Control Areas

BBDAR001 - Building Control Area DARWIN BUILDING AREA

Building Permits

Application Number: 2 of 2
Description: Upgrades of accommodation rooms inclusive of repainting, new floor covering and infill panels to windows. Upgrades of exit signs, emergency lights and fire doors.
Number of Residential Units:
Australian Bureau of Statistics Type: Flats or units of one to two storeys
Building Class: Residential (other than 1 or 2)
Area: (none found)
Certification: Residential (other than 1 or 2) - Full Code - *issued on 20/09/2012*

Application Number: 1 of 2
Description: Reroof hostel
Number of Residential Units:
Australian Bureau of Statistics Type: Flats or units of three storeys
Building Class: Residential (other than 1 or 2)
Area: (none found)
Certification: Residential (other than 1 or 2) - Full Code - *issued on 17/09/2004*

Visit the website <http://www.nt.gov.au/building/>

Custodian - Town Planning and Development Assessment Services (+61 8 8999 6046)

Planning Scheme Zone
MD (Multiple Dwelling)

Interim Development Control Orders
(none found)

Planning Notes
Significant Tree on Site; Contact Greening Australia on 8981 1344.

Planning Applications

File Number
PA2003/0330

Type
Extension of Time

Date Received
23/05/2005

Application Purpose
EXTENSION OF TIME FOR TWO YEARS

Application Status
Approved

Other Affected Parcels
(none found)

Instrument Signed

30/05/2005

Instrument Number

DP03/0180A

Instrument Issued

Signed

Instrument Status

Current

File Number

PA2003/0330

Type

Subdivision

Date Received

26/05/2003

Application Purpose

TO CREATE 2 LOTS EXH 30/5 - 13/6/03

Application Status

Approved

Other Affected Parcels

(none found)

Instrument Signed

13/08/2003

Instrument Number

DP03/0180

Instrument Issued

Signed

Instrument Status

Current

Custodian - Power and Water Corporation (1800 245 092)**Meters on Parcel**

Power Water - Electricity 1

Power Water - Water 1

For Account balances, contact the Power and Water Corporation.

Custodian - Pool Fencing Unit (+61 8 8924 3641)**Swimming Pool/Spa Status**

Pool Certified to Modified Australian Standard (MAS)

Pool Certified to Modified Australian Standard (MAS)

For more information, contact the Pool Fencing Unit (+61 8 8924 3641).



Custodian - Mines and Energy (+61 8 8999 5322)

For information on possible Mineral Titles or Petroleum Titles, contact Mines and Energy or visit the website
<http://strike.nt.gov.au>

Custodian - NT Environment Protection Authority (+61 8 8924 4218)

Results of site contamination assessment
(none found)

For further information contact Environment Protection Authority or visit the website
<https://ntepa.nt.gov.au/waste-pollution/contaminated-land>

Custodian - Heritage Branch (+61 8 8999 5039)

Heritage Listing:
(none found)

For further information on heritage places contact Heritage Branch or visit the website
<https://nt.gov.au/property/land/heritage-register-search-for-places-or-objects>

Other Interests

For Account balances, contact Darwin City Council

Date Registered: 25/11/2022

Volume 866 Folio 250

Duplicate Certificate as to Title issued? No

SEARCH CERTIFICATE

Lot 3494 Town of Darwin from plan(s) B 000064

Area under title is 728 square metres

Owner:

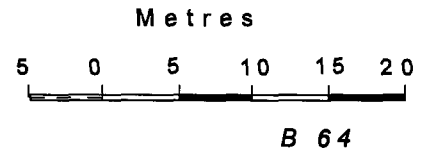
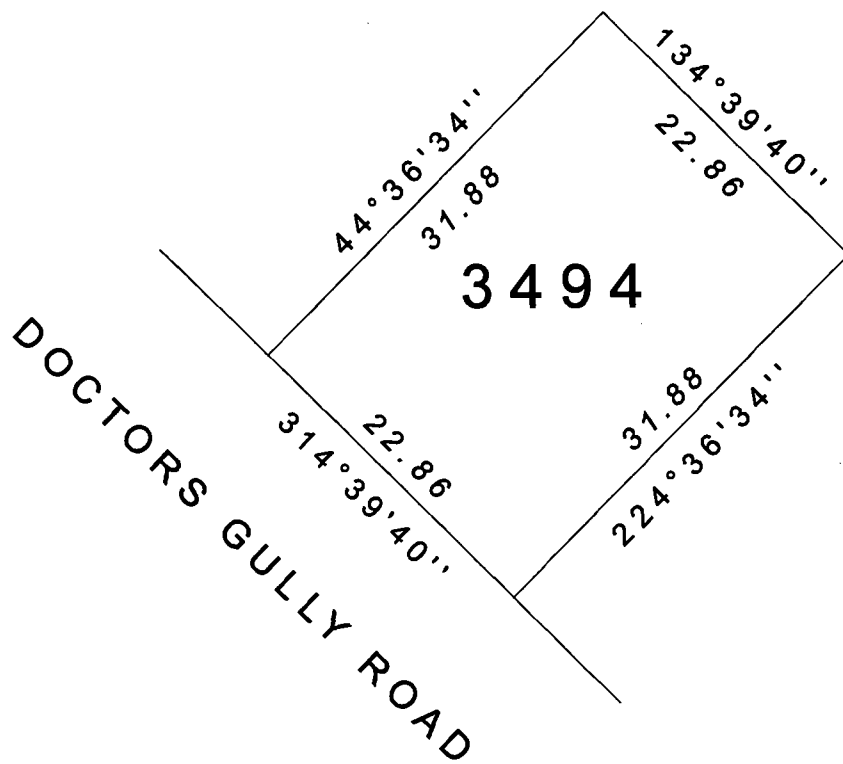
YWCA Australia (ACN 111 663 873)

of Level 1, 210 Kings Way, South Melbourne VIC 3205

Registered Date	Dealing Number	Description
-----------------	----------------	-------------

Previous title is Volume 706 Folio 548

End of Dealings





NORTHERN TERRITORY OF AUSTRALIA

Record of Administrative Interests and Information

Record of Administrative Interests and Information

The information contained in this record of Administrative Interests only relates to the below parcel reference.

Parcel Reference: Lot 03494 Town of Darwin plan(s) B 000064

(See section 38 of the Land Title Act)

Note: The Record of Administrative Interests and Information is not part of the Land Register and is not guaranteed by the Northern Territory of Australia, and the NT Government accepts no Liability for any omission, misstatement or inaccuracy contained in this statement.

Registrar General

Government Land Register

(none found)

Custodian - Registrar General (+61 8 8999 6252)

Current Title

CUFT 866 250 (order 1)

Tenure Type

ESTATE IN FEE SIMPLE

Tenure Status

Current

Area Under Title

728 square metres

Owners

YWCA Australia (ACN 111 663 873)
Level 1, 210 Kings Way, South Melbourne VIC 3205

Easements

(none found)

Scheme Name

(none found)

Scheme Body Corporate Name

(none found)

Reserved Name(s)

(none found)

Unit Entitlements

(none found)

Transfers

25/11/2022 for \$875,000 (Nil GST)
13/11/2006 for Order
30/09/1991 for \$130,000
09/01/1990 for \$125,000

Tenure Comments

(none found)

Historic Titles

CUFT 706 548 (order 1)
CUFT 173 124 (order 4)
CUFT 173 124 (order 3)
CUFT 173 124 (order 2)
CUFT 173 124 (order 1)
CUCL 189 029 (order 1)

Visit the website http://www.nt.gov.au/justice/bdm/land_title_office/

Custodian - Surveyor General (+61 8 8995 5354)**Address**

12 DOCTORS GULLY RD, LARRAKEYAH

Survey Plan

B.000064

Survey Status

Approved

Parcel Status

CURRENT

Parcel Area

728 square metres

Map Reference

Code 200 Scale 2500 Sheet 29.22

Parent Parcels

(none found)

Parcel Comments

DRC S75/1034/100

Survey Comments

(none found)

Proposed Easements

(none found)

Local Government Area

DARWIN MUNICIPALITY

Region

DARWIN

Custodian - Valuer General (+61 8 8995 5375)

Owner's Last Known Address

YWCA AUSTRALIA, LEVEL 1 210 KINGSWAY, SOUTH MELBOURNE VIC 3205

Parcels in Valuation

Lot 03494 Town of Darwin

Unimproved Capital Value

\$540,000 on 01/07/2023
\$490,000 on 01/07/2020
\$520,000 on 01/07/2017
\$580,000 on 01/07/2014
\$580,000 on 01/07/2011
\$458,000 on 01/07/2008
\$277,000 on 01/07/2005
\$208,000 on 01/07/2002
\$185,000 on 01/07/1999
\$132,000 on 01/07/1996
\$110,000 on 01/07/1993
\$65,000 on 01/01/1991
\$43,500 on 01/01/1988
\$39,500 on 01/01/1985
\$31,000 on 01/01/1982
\$15,700 on 01/05/1979
\$15,700 on 01/05/1977
\$12,300 on 01/05/1974

Custodian - Property Purchasing (+61 8 8999 6886)

Acquisitions

(none found)

Custodian - Building Advisory Service (+61 8 8999 8965)

Building Control Areas

BBDAR001 - Building Control Area DARWIN BUILDING AREA

Building Permits

Application Number: 2 of 2
Description: BATHROOM, LAUNDRY, STOREROOM & VERANDAH UPGRADE
Number of Residential Units: 0
Australian Bureau of Statistics Type: (none found)
Building Class: House
Area: 12 square metres
Certification: House - Full Code - *issued on 16/12/1993*

Application Number: 1 of 2
Description: HOUSE
Number of Residential Units: 1
Australian Bureau of Statistics Type: (none found)
Building Class: House
Area: 110 square metres
Certification: House - Full Code - *issued on 03/03/1981*

Visit the website <http://www.nt.gov.au/building/>

Custodian - Town Planning and Development Assessment Services (+61 8 8999 6046)

Planning Scheme Zone

LMR (Low-Medium Density Residential)

Overlays:

(none found)

Strategic Frameworks: The following strategic frameworks may apply to your land

Regional Plans:

- Darwin Regional Land Use Plan

Sub Regional Plans:

- None

Area Plans:

- Central Darwin Area Plan

Interim Development Control Orders

(none found)

Planning Notes

Significant Tree on Site; Contact Greening Australia on 8981 1344.

Planning Applications

(none found)

Custodian - Pastoral Estate - Vegetation Assessment Unit (+61 8 8999 4454)

(none found)

Visit the website for information on Pastoral land permits.

Custodian - Power and Water Corporation (1800 245 092)

Meters on Parcel

Power Water - Electricity 1
Power Water - Water 1

For Account balances, contact the Power and Water Corporation.

Custodian - Pool Fencing Unit (+61 8 8924 3641)

Swimming Pool/Spa Status

(none found)

For more information, contact the Pool Fencing Unit (+61 8 8924 3641).

Custodian - Department of Industry, Tourism and Trade (+61 8 8999 5263)

Mineral Titles

Title ID	Status	Title Type	Expiry Date	Legislation
RL390	Granted	Reserve Land		Mineral Titles Act 2010

For additional information contact the Mineral Titles Team on +61 8 8999 5322

Energy Titles

Title ID	Status	Title Type	Expiry Date	Legislation
GRO1	Granted	Geothermal Reserved from Occupation		Geothermal Energy Act 2009
RB56	Granted	Reservation of Blocks		Petroleum Act 1984
RB225	Granted	Reservation of Blocks		Petroleum Act 1984

For additional information contact the Petroleum Tenure Team on +61 8 8999 5263

Land Access Agreements

(none found)

For additional information contact the Land Access Team on +61 8 8999 6442

For further information contact as above or visit the website <https://strike.nt.gov.au>

Custodian - NT Environment Protection Authority (+61 8 8924 4218)

Results of site contamination assessment

(none found)

For further information contact Environment Protection Authority or visit the website <https://ntepa.nt.gov.au/your-business/public-registers/contaminated-land-audits>

Custodian - Heritage Branch (+61 8 8999 5039)

Heritage Listing:

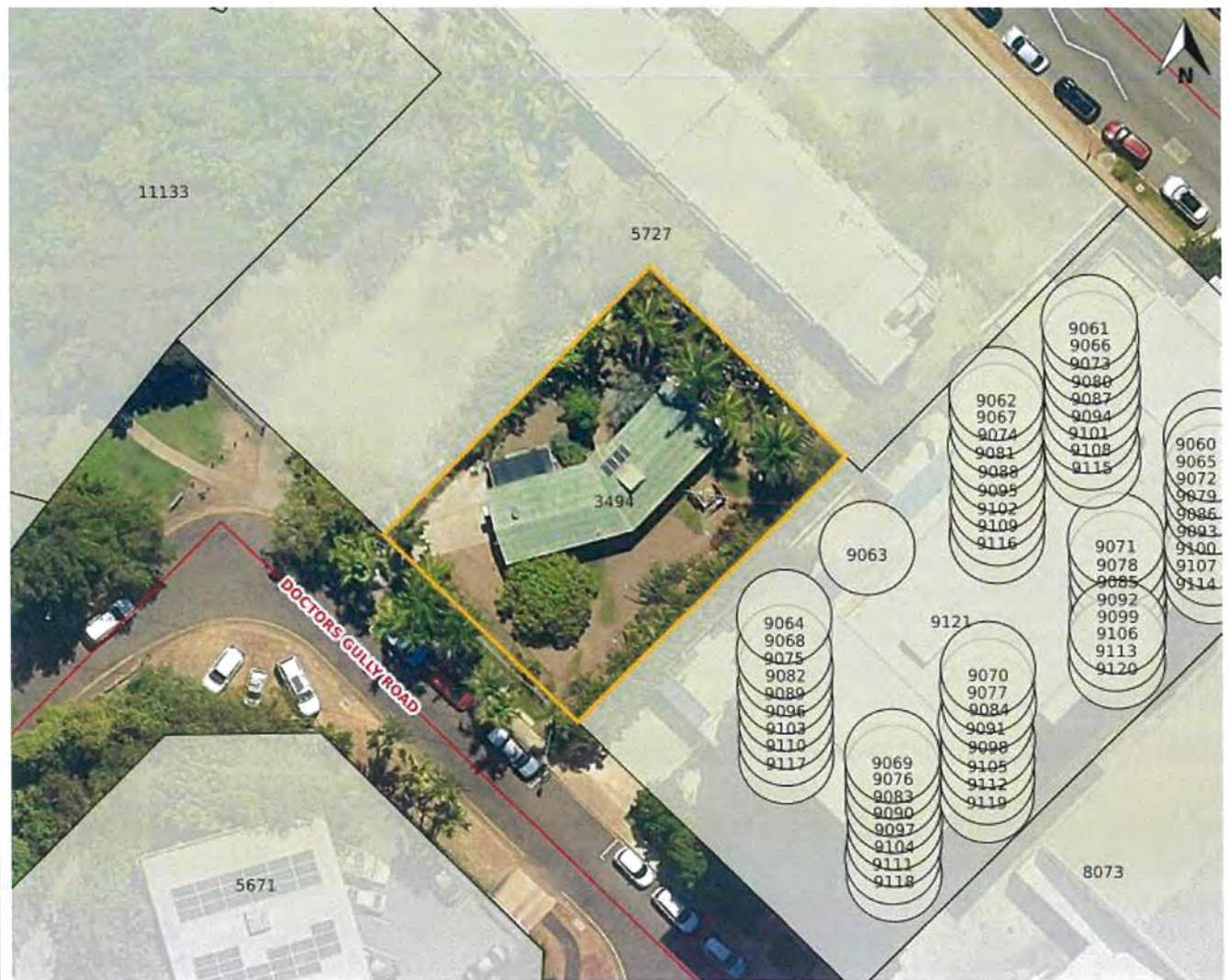
(none found)

For further information on heritage places contact Heritage Branch or visit the website
<https://nt.gov.au/property/land/heritage-register-search-for-places-or-objects>

Other Interests

For Account balances, contact Darwin City Council

Locality Diagram



YWCA Australia 121 Mitchell Street Rezoning Early Consultation Summary

May 2025

Introduction

True North Strategic Communication has now completed its preliminary consultation program on behalf of YWCA Australia regarding landholdings at 121 Mitchell Street and 12 Doctors Gully Road, Larrakeyah.

YWCA engaged True North Strategic Communication (True North) to lead a targeted, early consultation program to understand initial views about the proposal to rezone the site. Consultation ran for 4 weeks from 19 February – 19 March 2025 and preceded YWCA’s application for a Planning Scheme Amendment to the Northern Territory Planning Commission.

True North led the early consultation program which focused on engaging with local residents, businesses and key community groups using various tools and tactics, such as fact sheets, telephone and email, face to face meetings and letterbox drops. True North developed an independent consultation report outlining the consultation findings.

Findings and key themes

The table below outlines the key themes raised during this early consultation program and YWCA has provided a commitment in response.

Themes	YWCA’s commitment
<ul style="list-style-type: none"> • Increase in antisocial behaviour, crime and safety issues – many residents were concerned the development would attract undesirable behaviour to the area and the high density would impact overall safety and amenity. 	<p>YWCA is an experienced community housing provider and tenancy management specialist. As the only national women’s housing provider in Australia, we provide and advocate for improved access to safe, secure, and affordable housing for low to medium income Australians, particularly women and their children. This includes women from culturally and linguistically diverse backgrounds, refugees, and First Nations women.</p> <p>Safe, secure, and affordable housing is fundamental to women’s social, economic and educational participation. This accommodation will provide stable and quality housing for women and will not be used as a crisis accommodation facility. YWCA has extensive experience in providing community housing for all backgrounds.</p> <p>Criteria of tenants will be based on income and asset eligibility (low to medium income), and whether they are a resident of the Northern Territory and female. YWCA is committed to finding housing solutions for tenants who are in keeping with the values of the surrounding community and will implement the obligations contained within the Residential Tenancies Act if any tenant were to breach their duties as a renter.</p> <p>YWCA anticipates this development will be like the many other developments YWCA has successfully developed and</p>

	managed over its extensive history of helping women in Australia.
<ul style="list-style-type: none"> • Size and scale of development – there were concerns about the scale of the development, including the height obstructing ocean views for neighbouring properties and the density not being best suited for social and affordable housing. 	The size and scale of the proposed development is in keeping with the surrounding buildings and neighbourhood and limits the building to a maximum of 8 storeys. If the proposal to rezone the site is approved, the next stage will involve submitting a formal development application to the Development Consent Authority. As part of this process, YWCA will conduct a detailed consultation program with the wider community to help inform this application.
<ul style="list-style-type: none"> • Suitability of location – some questioned the suitability of the location and suggested it would be better suited elsewhere. 	YWCA is committed to building more affordable housing for the Darwin community. The proposed project will help to reactivate the site which is currently unoccupied and dilapidated and provide much-needed, secure housing solutions for women and their families in the Northern Territory.
<ul style="list-style-type: none"> • Lack of detail – many said there was a lack of detail around the proposed development and said they could not make an informed decision about rezoning the site without a looking at a concept plan first. 	<p>This early engagement program focused on understanding initial views about the project and proposal to rezone the site. Limited information is publicly available at this stage as the next stages of the project are yet to be fully determined and remain contingent on funding. The next stage, should it proceed, will involve submitting a formal development application to the Development Consent Authority where more detail around the proposed development will be available.</p> <p>YWCA is committed to engaging with stakeholders and residents throughout the lifespan of the project and upon the project proceeding will conduct further and more detailed consultation with the wider community.</p>
<ul style="list-style-type: none"> • Increased traffic and parking issues – stakeholders and residents pointed out the existing traffic and parking issues in the area, particularly around peak times in the morning and afternoon on Mitchell Street. There were concerns these issues would worsen. 	An informed proposal outlining parking and traffic management will be included as part of the formal development application process with the Development Consent Authority. When further consultation occurs, the community will have the opportunity to review and provide feedback on these plans.
<ul style="list-style-type: none"> • Impacts to property value – many residents were concerned the development would devalue their properties, particularly if there is an increase in antisocial behaviour and impact to the existing overall amenity of the area. 	Social and affordable housing is an important part of our community framework and a nationwide initiative that is underpinned by the Australian Government’s planning policy.

Next steps

YWCA plans to lodge a Planning Scheme Amendment with the Northern Territory Planning Commission to rezone 121 Mitchell Street and 12 Doctors Gully Road to Specific Use Zoning in 2025.

True North has now concluded the consultation process. Any further enquiries about this project can be directed to YWCA Australia contact.development@ywca.com.au

1st October 2025

Development Assessment Services
City of Darwin

Dear Sir/Madam,

**RE: PROPOSED REZONING AND REDEVELOPEMENT-121 MITCHELL STREET,
LARRAKEYAH AND 12 DOCTORS GULLY ROAD, LARRAKEYAH.**

This letter is to voice my formal objection and concern of the proposed development application **PA2025/0283**. The current development has been formally submitted to have a rezoning of Lots 03494 and 05727 (12 Doctors Gully Rd & 121 Mitchell St, Larrakeyah) from LMR (Low-Medium Density Residential) to SU (Specific Use).

The development before the committee has submission which seeks to gain approval for a rezoning of two Lots to SU but it is clear from the submitted Explanatory Document that the proposal seeks not only a rezoning but a rezoning with the same conditions applicable to HR zoning allowances - Paragraph 4.1 (page 11).

As an Owner and resident of 2 units at 10 Doctors Gully, Larrakeyah I strongly as that Development Assessment services along with all sitting members reviewing this proposal reject the rezoning with the following considerations in mind;

Existing Zoning and Planning Act

- While the two Lots border CBD and HR zoned Lots The Planning Act of the Northern Territory was amended extensively with considerable changes to height limits, setbacks and changes to zoning boundaries including the CBD and surrounding suburbs. One of the specific changes to the Planning Act was a clear and conscious decision by the then Government to redefine all existing zoning and limiting multi-dwelling development to the suburb of Larrakeyah in order to preserve the local lifestyle and aesthetics.

The then Planning Minister as well as the Department of Lands, Planning and Environment made a very conscious decision with to restrict both sites – 12 Doctors Gully Rd and 119 Mitchell St to a LMR zoning and largely the entire Western side of Mitchell St. The rezoning went through rigorous public dialogue with the proposal from the then Minister being based on the preservation of the residential suburb and amenity of Larrakeyah from any large scale development. The LMR zoning of both sites was in all respects deliberate with its approach and was essentially a defined “line in the sand” to the redevelopment of Larrakeyah.

Developers for 10 Doctors Gully Rd did not apply for any rezoning when the development was put forward to DAS for its approval, its design and proposal was in full compliance of the its current zoning allowance.

Direct Impact to Residents of 10 Doctors Gully, Larrakeyah

- The design and development approval of 10 Doctors Gully Road, Larrakeyah was done with specific consideration to the existing zoning of both sites including surrounding buildings. Privacy screen walls of the 1st level units were built to have a >1500mm high pre-cast wall in order to provide privacy to the existing residence of 12 Doctors Gully Rd, Larrakeyah. Had either site (12 Doctors Gully Rd or 119 Mitchell Street) had an existing zoning of MR or HR then the overall design, orientation and privacy for all units on the North-West face of 10 Doctors Gully Rd would have considerable differences in design requirements, privacy restrictions, amenity design consideration as well as possibly an increase in setback requirements. There has been no consideration or request was made by the Development Consent Authority on the possibility of such a zoning change to the neighboring sites whereby the proposed development may have undergone specific design restrictions.

The development of 10 Doctors Gully was designed with its main setback on the Daly street end. Balconies, courtyards, kitchen area, bedrooms and living areas for 27 units all overlook the Lots 5727 Mitchell Street and 3494 Doctors Gully. The orientation of bedrooms, living areas, amenities and overall design intent of the development would have had a vastly different proposal had the two Lots had an existing zoning of HR. All owners and residents of these 27 Units will be severely and detrimentally impacted by the rezoning.

Reduced Car Parking

- The application for the rezoning requests approval for reduced car parking requirements. Mitchell Street and Doctors Gully Rd is already highly congested from on-street parking from 8am to 5pm, Monday to Friday due to either overflow parking from surrounding residential buildings as well as local businesses such as the childcare facility (127 Mitchell Street) as well as the hotel and other neighboring buildings across the road (105 Mitchell Street).
- The application has cited Social and Affordable Housing Case Studies for both South Australia and Victoria as an argument for a further reduction in car parking requirements restrictions that would otherwise exist under the Darwin Town Plan. It is frankly absurd for the applicant to even consider using either case study as a comparative application to the site as it is very clear Darwin does not provide the quality of public transport that either state provides. Darwin has a bus service as the single and only mode of public transport. There is no other facility available within or outside the CBD limits.
- The application makes no mention of any proposed density for the Lot(s) of any proposed development of the site and should not be given any future consideration or conditional waiver for car parking requirements under the Darwin Town Plan without a formal development application being made to DAS.

Density and Impact to neighboring properties

- Over the course of the last 10 years residing at 10 Doctors Gully there has been a considerable number of police attendances (as well as unreported incidents) relating to public drunkenness as well as evidence of residents or visitors being under the effects of illicit drug use at the current YMCA facility (7 Doctors Gully Rd). There has also been previous incidents of damage being caused to cars parked on the street belonging to residents and theft to vehicles parked in the basement carpark. Such incidents are likely to not be isolated to residents of 10 Doctors Gully and may involve residents property at 1 Daly Street.
- The proposal for rezoning makes specific mention that the facility aims to “improve the availability of long-term housing for women victim-survivors of family and domestic violence, particularly those transitioning from emergency or short-term supported accommodation”. While such accommodation is certainly required and supported by the larger community the rezoning and future development of the Lots is not for such exclusivity of use. It certainly has not been the primary intended use of the existing YMCA facility for the previous 10 years.
- The existing 3 storey building at 7 Doctors Gully Rd, has a current capacity of 90 rooms. The proposed Lots which the applicant has sought for rezoning has a combined area of 3,488 which is of similar land area as their existing site at 7 Doctors Gully Rd. The proposal to seek HR approval as a condition of the rezoning would allow for an approximate 150 to 240 rooms – Based on the existing equation of 30 rooms per floor and a building of a similar height to 10 Doctors Gully Rd (8 stories) and all varying between 1, 2 and 3 bedroom apartments. An expectation of such density to be in the vicinity of 300 to 400 residents.

If the YMCA is unable to effectively manage and run their existing facility (Pool is unkept, residents unrest and the like) how does the YMCA propose to facilitate managing a complex 3 times larger than the current facility? This level of concentration of low cost housing to one building as well as the area of Larrakeyah will cause untold long term and long lasting damage to all the neighboring residents of Larrakeyah and neighboring CBD.

There is already a long standing low cost housing complex at 106 Smith Street which has been the subject of countless incidents involving police including extreme level of violence. The existing complex at 106 Smith Street are 6 buildings and do not house the same number of people that are likely to be residing under the new rezoning submission. The development is also far more concentrated.

Day Care Facility

- The Day Care facility at 127 Mitchell Street has been a long standing stalwart to residents of Larrakeyah and to the wider community working within the CBD and neighbouring businesses. There are only two Day Care facilities that provide Day Care facilities for working parents in the CBD and neighboring suburbs.

A highly concentrated low cost housing development directly adjacent to such a facility will result in a drastic change in security concerns for the facility and there is a significant risk of closure should this development proceed.

True intent

- Written within the Explanatory Document Paragraph 4.1 – Explanation of the proposed Amendment "...in accordance with Zone HR, without having to specify additional land use and development criteria within the Specific Use Zone. This will ensure future adaptability of the Land in the event that the YMCA vacates the premises at some stage in the future, in a manner that is consistent with other forms of development in Zone HR."

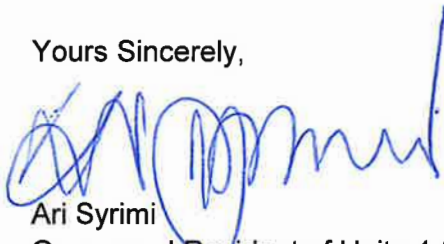
It is very clear from this statement that any low cost housing proposal made as a reason for the rezoning has a short timeframe in mind and private sale of the development is the overall intention. With the proposed reduced car parking requirements this development will cause irreparable damage to street congestion and existing living standards that currently exist to the suburb of Larrakeyah.

Conclusion

Through consultation of the wider public it will be clear that a majority of Territorians acknowledge the need for low cost housing availability including the housing and protection of victims of domestic violence. This application for rezoning and the intent for such a development is not the solution nor appropriate in its scale for the suburb of Larrakeyah.

There are other solutions for the two Lots and there are likely to be alternative sites available for redevelopment for low cost housing but a larger and wider consultation needs to be undertaken. I strongly urge the sitting members and the DAS to reject the submission **PA2025/0283** for rezoning.

Yours Sincerely,



Ari Syrimi

Owner and Resident of Units 4 & 5, 10 Doctors Gully Road, Larrakeyah.

Efstathios Tsirbas
16/10 Doctors Gully Rd
Larrakeyah NT 0820

3rd October 2025

Dear Members of the Development Consent Authority,

Re: PA2025/0283

Objection to the Rezoning Proposal for the Former Hostel Site at 121 Mitchell St & 12 Doctors Gully Rd – Changing from LMR to Specific Use (High-Rise Residential for Transitional Housing)

As a local in Larrakeyah living next to the old hostel location, I firmly object to changing the zoning here from 2-3 levels to permit tall apartment towers for temporary shelter aimed at domestic violence victims. While I back efforts to aid those in crisis, this particular spot isn't right for it, and the plan needs to be turned down.

Main issues:

1. **Adjacent to Childcare:** Right beside a daycare serving toddlers and neighborhood families, the development could introduce more cars and strangers, putting kids at risk and deterring guardians, which might jeopardize the facility's viability.
2. **Aggravated Congestion:** The fringes of Darwin's city center are already plagued by busy streets and scarce spots to park. Adding a skyscraper would bring in extra cars, leading to gridlock, collisions, racket, fumes, and holdups for urgent services.
3. **Chance of Disturbances:** Such shelters might spark disturbances like clamor or hangouts, particularly if oversight is lax. Placing one in this peaceful area could disturb households and elderly folks, eroding overall neighborhood security.
4. **Decline in Home Worth:** Shifting to intense urban living would alter the area's cozy, low-slung, kid-focused atmosphere, lowering values for surrounding properties and affecting established owners.

5. Damage to Tiny Forest: Bordering the unique woodland at Doctors Gully, building work might interfere with drainage, harm wildlife habitats, and endanger landmarks such as Peel's Well.

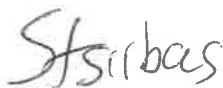
6. Blow to Local Attractions: The project could interfere with the Aquascene fish-viewing spot through clamor, obstructed sights, and contaminants, reducing footfall and impacting the area's tourism revenue.

7. Danger of Deviating from Plans: Once rezoning is granted, developers could sidestep the initial purpose via special permits and erect an unrelated towering structure, leaving little say for authorities or locals.

Overall, the rezoning overlooks the site's drawbacks, effects on residents, and viable alternatives. I urge you to deny it and propose fitting locations instead.

I'd appreciate an opportunity to expand on this or provide more info, and please keep me posted on any meetings or rulings.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'Efstathios Tsirbas'. The signature is written in a cursive, slightly slanted style.

Efstathios Tsirbas

George and Athina Tsirbas

13 Larrakeyah Tce

Larrakeyah NT 0820

PO Box 37726

Winnellie NT 0820

0417 859 496

Dear Members of the Development Consent Authority,

Re: Objection to the Rezoning Proposal for the Former Hostel Site at 121 Mitchell St – Changing from LMR to Specific Use (High-Rise Residential for Transitional Housing)

As a resident of Larrakeyah residing near the former hostel site under consideration for rezoning, I am submitting this letter to firmly oppose the plan to change the site's height restrictions from 8.5m maximum to permit high-rise residential construction, especially for transitional housing aimed at domestic violence survivors. Although I wholeheartedly endorse efforts to support those in need within our community, I maintain that this site is wholly inappropriate for the project, and the rezoning request must be denied.

My concerns stem from the following critical issues, detailed below:

1. **Adjacency to a Childcare Facility:** The property sits right beside an operational childcare centre catering to infants and local families. Permitting high-rise transitional housing so close by poses serious risks to child safety and well-being. Heightened pedestrian activity, unknown visitors, and possible unpredictable encounters could undermine the safe haven required for childcare activities. This change might endanger young children with avoidable threats and discourage parental enrolment, jeopardizing the centre's sustainability.
2. **Heightened Traffic and Congestion:** The edges of Darwin's CBD are already grappling with rising vehicular demands, featuring tight roads and scarce parking. A tall building here would undoubtedly generate more traffic from occupants, service providers, guests, and supply trucks, worsening bottlenecks, elevating crash dangers, and overburdening roads ill-equipped for such density. Living nearby, I worry about the ongoing disturbances this would bring, such as louder noise, higher emissions, and hampered access for emergency responders.
3. **Risk of Disruptive Conduct:** Essential as transitional housing is, it can occasionally involve issues like disruptive actions, particularly in compact environments lacking sufficient on-site supervision. Positioning this in a suburban edge rather than a managed urban centre amplifies these possibilities. Local households, including those with children and seniors, might endure nuisances such as disturbances, lingering crowds,

or similar problems that undermine neighbourhood security and unity. This isn't an ideal spot for a service that could benefit from enhanced monitoring to prevent such effects.

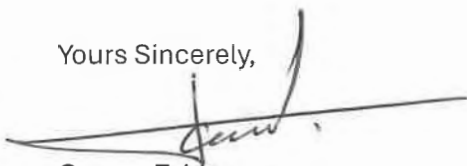
4. **Decline in Surrounding Property Values:** Introducing high-rise transitional units into this low-density residential district would probably lower the worth of adjacent homes and lots. Area owners and buyers have depended on the current zoning to preserve a steady, family-focused vibe. Allowing denser builds could shift the visual and practical charm of the neighbourhood, curbing buyer appeal and causing monetary setbacks for established locals like me. The proposal seems to favour immediate demands at the expense of the area's enduring financial health.
5. **Existence of Superior Alternative Locations:** Darwin and the Northern Territory boast plenty of better-suited spots for transitional housing. Places nearer to key resources—like transit stops, healthcare providers, therapy centres, job opportunities, and social hubs—would better aid those requiring assistance. For example, locations outside the CBD and alongside proven support systems could deliver improved access without burdening serene residential or CBD outskirts. Choosing this site ignores these preferable choices and neglects wider considerations for equitable city growth. The Darwin CBD is not the right location for this type of facility.
6. **Ecological Effects on the Nearby Micro Rainforest:** The location borders the micro rainforest at Doctors Gully, an exceptional green haven with lush foliage that acts as a crucial wildlife refuge amid the city including landmarks like Peel's Well, Darwin's first water supply. The existing NT Planning Scheme identifies the area on the left of Mitchell St from Doctors Gully Rd through to Cullen Bay as a low-medium density with maximum height of 8.5m. This way it protects the water table and ecosystem from any unfriendly actions that high-rise development requires. I have developed, a few years ago, the adjacent building at 112 Mitchell St/10 Doctors Gully Rd known as Catalina Apartments. Even though that building is not directly above Peels Well and the magnificent little rainforest, during the construction of the basement of the 7-storey building I experienced that the water table coming down from Gardens Road to be very shallow. Quite a bit of water gets captured in the basement of the building. This water needs to be pumped out and lost to stormwater rather than feeding down stream to the green forest. You can imagine the disastrous effects if the rezoning is allowed of a high rise directly above peels Well.
7. **Effects on the Pathway to Adjacent Fish-Feeding Attraction and Mindil Beach Markets:** Mitchell Street is a major pathway for tourists to access the Mindil Beach Markets and Cullen Bay. At Doctors Gully lies the popular Aquascene fish-feeding site, a safeguarded coastal haven where tourists interact with native fish at peak tides, bolstering regional tourism and revenue. The rezoning and high-rise erection would bring racket, sightline barriers, airborne particles, and possible pollutant discharge, spoiling the peaceful setting vital to the site's allure. This might lessen guest satisfaction, cut visits, and endanger the venue's future, jeopardizing a vital heritage and leisure draw on Darwin's CBD periphery. Further, ongoing use as a domestic violence shelter and the potential for anti-social behaviour will negatively affect the experience of tourists and locals enjoying the walk from the CBD to Cullen Bay and the Markets.
8. **Change of Intention after Rezoning Approved**

The exists a mechanism for an Exceptional Development Permit can be requested to achieve different aims to what the current zoning allows without introducing the risk that the developer may change their original intention and develop the site differently to what is currently advertised. The rezoning provides a potential pathway to the developer to change their mind after the fact and with very little recourse for the DCA and local residents to be consulted.

To wrap up, although the goal of offering transitional housing for domestic violence survivors is praiseworthy, rezoning this ex-hostel plot is ill-advised and harmful to the neighbourhood. It overlooks the location's mismatch owing to its nearness to delicate operations, along with repercussions for transport, security, real estate worth, nature, and visitor draws, plus the presence of stronger options. I implore the Development Consent Authority to dismiss this proposal outright.

I would value the chance to elaborate on these points or supply further details as needed. Kindly update me on any upcoming sessions or outcomes concerning this issue.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'George Tsirbas', written over a horizontal line.

George Tsirbas

3/10/25

29 Sep. 25

The Minister
Hon Joshua (Josh) Burgoyne
Lands, Planning and Environment

Dear Sir/Madam

**OBJECTION – Lot 05727 Town of Darwin, 121 MITCHELL ST
LARRAKEYAH and Lot 03494, Town of Darwin, 12 DOCTORS GULLY RD
LARRAKEYAH**

We, the Body Corporate of **UTS 2014/024** located at 10 Doctors Gully, wish to raise our strong objection to the rezoning of the subject land from LMR (Low-Medium Density Residential) to a Specific Use zone. The reasons for objection are as follows:

1. ZONING

- 1.1 The two sites are currently zoned LMR (Low-Medium Density) with an allowable height limit of two storeys at a maximum height of 8.5 m.
- 1.2 The land can therefore be developed for residential purposes without the need for rezoning. Dwelling-group is merit assessable under the assessment table to zone LMR of the NT Planning Scheme.
- 1.3 Part 5 of the NT Planning Scheme gives the Development Consent Authority the discretion to vary car parking requirements and density if justified. The intent and merit to increase density and vary car parking to enable affordable housing can be achieved without the need to change the zoning, as the current zone is for residential use.
- 1.4 The current zone (LMR) should therefore be retained to facilitate social and affordable housing

2. CENTRAL DARWIN AREA PLAN

- 2.1 The Area Plan identifies the land as a potential change to TC (Tourist Commercial). This Area Plan is a product of extensive community consultation that identified the land for TC. Whilst the application states that this was supported by YMC through its submission, it also gave confidence to the nearby community, as the current zoning and potential change had reasonable height restrictions.
- 2.2 The intention of the proposed rezoning, which entails provisions of HR (High Density Residential), invokes significant departure from the current zone and potential change under the Area Plan.
- 2.3 Larrakeyah is an established suburb with a distinct mixture of land zonings identified through the zoning map of the NT Planning Scheme and the potential areas of change under the Area Plan. The area between Mitchell and Houston Streets is mainly zoned HR, allowing for high-density residential development.

2.4 There is an adequate supply of HR zone to facilitate social and affordable housing without the need to amend the Area Plan in the locality. The subject sites should keep their current zoning and be developed accordingly.

3. SOCIAL AND AFFORDABLE HOUSING

3.1 The application statement states, "*The proposed specific use zone has been primarily based on the High Density Residential (HR) Zone, per **Clause 4.5** of the Planning Scheme, however modified to apply specific car parking requirements to and allow the inclusion of ancillary administration space within a social and affordable housing development.*"

3.2 Since the land is zoned LMR, requirements for car parking and administrative spaces can be included in a social and affordable housing project through an Exceptional Development Permit (EDP), without requiring a zoning change.

3.3 The arguments supporting the necessity for social and affordable housing are valid and may be submitted to the Lands, Planning and Environment Minister through an EDP without requiring a change in zoning.

3.4 Although an EDP does not need to follow Part 5 of the Scheme, the proposal can largely align with the current zone while adjusting for car parking needs and including ancillary administration space in a social and affordable housing project.

4. CHALLENGES OF SOCIAL AND AFFORDABLE HOUSING

4.1 Both government and non-governmental organizations recognize a severe nationwide shortage of this housing type.

4.2 The subject site is available to address the need, but the proposed rezoning is not necessary since the land is already zoned for residential development.

4.3 Elevated concentrations of social housing may contribute to heightened stigma and perceptions of disadvantage; however, initiatives such as social housing renewal are designed to foster more integrated communities and mitigate these challenges.

4.4 Although this application is not for development, creating an HR zone type through a Specific Use zone may lead to a concentration of vulnerable populations with complex needs. The current site allows for a manageable number of homes; therefore, it's advisable to avoid high-density social and affordable housing to prevent potential issues.

Attached to this letter is a list of owners and occupants of 10 Doctors Gully, raising their objection to the proposed rezoning in its current form.

Kind regards,



Daniel Meyers

The Chair

Body Corporate (UTS 2014/024)

Account Code	Lot Number	Unit Number	Address Title1	Address Title2	Address Line1	Address Line2
02100001	1.1	1	Derek Lee	Unit 1	10 Doctors Gully Road	Larrakeyah NT 0820
02100002	1.2	2	Christopher Paul & Juliette	Lorraine Cools	Unit 4/22 Fisher Street	Fullarton SA 5063
02100003	1.3	3	S & H Knights Family Pty Ltd	ATF S & H Knights Family SMSF	22 Gilda Street	North Ryde NSW 2113
02100004	1.4	4	Tyenna Pty Ltd	GPO Box 3169	DARWIN NT 0801	
02100005	1.5	5	Tyenna Pty Ltd	GPO Box 3169	DARWIN NT 0801	
02100006	2.1	6	Rodney Steven Blair	PO Box 113	NUNDAH QLD 4012	
02100007	2.2	7	Neil John Padley	19 Blue Gum Place	WAKERLEY QLD 4154	
02100008	2.3	8	Mr Bryce R Harrop	8/10 Doctors Gully Road	LARRAKEYAH 0820	DARWIN NT
02100009	2.4	9	Richard Anthony Borg	Unit 6/3 Queen Street	Stuart Park NT 0820	
02100010	2.5	10	Durninda Priyankara Wijedasa	Denagama Vithanage	Unit 10/10 Doctors Gully Road	Larrakeyah NT 0820
			Thilakshi Darshika	Wethashinghe Mudiyanselage	Unit 10/10 Doctors Gully Road	Larrakeyah NT 0820
02100011	2.6	11	Mr Kevin & Mrs Pauline Teahan	30 Morant Circuit	KAMBAH ACT 2902	
02100012	2.7	12	Sharon Louise Naylor	Smith Real Estate NT	PO Box 782	Nightcliff NT 0814
02100013	3.1	13	Mr EJ & Mrs S Zahra	43 Reordan Drv	GREENWITH SA 5125	
02100014	3.2	14	Mr Simon L Flavell	14/10 Doctors Gully Rd	LARRAKEYAH NT 0820	
02100015	3.3	15	Mr Bradley Paul Garland	1502/2 Quay Street	HAYMARKET NSW 2000	
02100016	3.4	16	Efstathios Tsrbas & Simone	Douglas	Unit 16/10 Doctors Gully	DARWIN NT 0820
02100017	3.5	17	Mr M D Buckett	17/10 DOCTORS GULLY	LARRAKEYAH NT 0820	
02100018	3.6	18	Mr R & Mrs G Humphris	6 Collins Street	North Narrabeen NSW 2101	
02100019	3.7	19	Prabodh Kumar Das	7 Girraween Street	Wollert, VIC 3750	
02100020	4.1	20	Mr Matthew Raymond Chin	15 Kyabra St	FARRAR NT 0830	
02100021	4.2	21	Mr Mark Anthony Byers	PO Box 297	Coolalinga NT 0839	
02100022	4.3	22	Murray Ian & Lesley Robinson	PO Box 130	RAINBOW VIC 3424	
02100023	4.4	23	Lay Properties Pty Ltd	305 Bagot Road	Coconut Grove NT 0810	
02100024	4.5	24	Yolanda	305 Bagot Road	Coconut Grove NT 0810	
02100025	4.6	25	Ms Kylie Louise Reynolds	4/5 Mitaros Place	Parap, NT 0820	
02100026	4.7	26	Frederic Jean Lafon	35 Anzac Park	REID ACT 2612	
02100027	5.1	27	Mr Louie & Mrs Louise Bruin	17 Peter St	DROMANA VIC 3936	
02100028	5.2	28	Josephine Brine	28/10 Doctors Gully	LARRAKEYAH NT 0820	
02100029	5.3	29	Anthony Phillip Clarke	29/10 Doctors Gully Road	LARRAKEYAH NT 0820	
02100030	5.4	30	D & S Lelekis	1/19 Westralia St	STUART PARK NT 0820	
02100031	5.5	31	Mr Bertrand R Arlove	59b Birkett Street	BEDFORD WA 6052	
02100032	5.6	32	Allison Louise Hayes	32/10 Doctors Gully Road	Larrakeyah NT 0820	
02100033	5.7	33	Sarah Kathleen Coburn	Unit 33	Larrakeyah NT 0820	
02100034	6.1	34	Mr Mark Anthony Britton	55 Bunarba Road	GYMEA BAY NSW 2227	
02100035	6.2	35	MEMFX Properties Pty Ltd as	Trustee for MEMFX Super Fund	655 Henry Lawson Drive	EURUNDEREE NSW 2850
02100036	6.3	36	Larry Robert Learmonth	Unit 36	10 Doctors Gully Road	Larrakeyah NT 0820
02100037	6.4	37	Daniel James	Susanne Katrin Kameg Meyers	GPO Box 4732	Darwin NT 4211

02100038	6.5	38	Daniel James Meyers	37/10 Doctors Gully Road	Larrakeyah, NT 0820
02100039	6.6	39	Susanne Katrin Kameg Meyers	37/10 Doctors Gully Road	Larrakeyah, NT 0820
02100040	6.7	40	Susan Mary Pollard	39/10 Doctors Gully Road	Larrakeyah NT 0820
02100041	7.1	41	Allan Palaoan Tipon	Unit 40/10 Doctors Gully	Larrakeyah NT 0820
02100042	7.2	42	R & L SMSF Pty Ltd	Unit 23	13 Stuart Street
02100043	7.3	43	Lindsey Douglas Prosser	13 Gakkinga Street	Lyons NT 0810
02100044	7.4	44	Martina Livet	13 Gakkinga Street	Lyons NT 0810
02100045	7.5	45	Nicola Jackson	43/10 Doctors Gully Road	Larrakeyah NT 0820
02100046	7.6	46	Stephen William Fletcher	43/10 Doctors Gully Road	Larrakeyah NT 0820
02100047	7.7	47	Shane & Glenda Thornton	2 Little Street	FANNIE BAY NT 0820
02100048	8.1	48	Mei Siu Jessica Lim	45/10 DOCTORS GULLY ROAD	LARRAKEYAH NT 0820
02100049	8.2	49	Brooke Francis Madden	25A Ryan Street	Balgownie NSW 2519
02100050	8.3	50	Sean Roy Kimble	47/10 Doctors Gully Road	LARRAKEYAH NT 0820
02100051	8.4	51	Bradley A & Kylie A Jarman	7 Bangalay Rd	Tahmoor NSW 2573
02100052	8.5	52	Ji Bennett & Bm Kellam	8 Sprigg Street	MILLNER NT 0810
02100053	8.6	53	Luke Arkapaw	50/10 Doctors Gully Road	LARRAKEYAH NT 0820
02100054	8.7	54	Pyri Nominees Pty Ltd	PO Box 102	Nightcliff NT 0814
02100055	9.1	55	Jude Gerard Lee	GPO BOX 2555	DARWIN NT 0800
02100056	9.2	56	Ying-Fang Lucy Chen	Unit 53/10 Doctors Gully	LARRAKEYAH NT 0820
02100057	9.3	57	Reece Barrett & Debbie Brown	6 Caspian Court	GWELLUP WA 6018
02100058	9.4	58	Patrick David Peck	55/10 Doctors Gully Road	LARRAKEYAH NT 0820
02100059	9.5	59	Mr Simon Patrick Marley	35 Monash Avenue	Como, W.A, 6152
02100060	9.6	60	Hannah Louise Richards	9425 Great Alpine Road	Omeo VIC 3898
02100061	9.7	61	Jamie Ronald Symonds	9425 Great Alpine Road	Omeo VIC 3898
			Gary & Jennilyn Yee	PO BOX 404	PARAP NT 0804
			Jared Donald Clow	59/10 Doctors Gully Road	Larrakeyah NT 0820
			Mr Paul R & Mrs Janeen F Rohan	10 Wingoon Drive	EAGLEHAWK VIC 3556
			Mr Colin & Mrs Sharyn Boddy	152 Lanes Road	ALBERTON WEST VIC 3971
					Manly NSW 2095

29 Sep. 25

The Minister
Hon Joshua (Josh) Burgoyne
Lands, Planning and Environment

Dear Sir/Madam

OBJECTION - Lot 05727 Town of Darwin, 121 Mitchell Street, Larrakeyah, and Lot 03494, Town of Darwin, 12 Doctors Gully Road Larrakeyah

We, the Body Corporate of UTS 2015/039 located at 2 Mauna Loa Street, Larrakeyah, wish to raise our strong objection to the rezoning of the subject land from LMR (Low-Medium Density Residential) to a Specific Use zone. The reasons for objection are as follows:

1. ZONING

- 1.1 The two sites are currently zoned LMR (Low-Medium Density) with an allowable height limit of two storeys at a maximum height of 8.5 m.
- 1.2 The land can therefore be developed for residential purposes without the need for rezoning. Dwelling-group is merit assessable under the assessment table to zone LMR of the NT Planning Scheme.
- 1.3 Part 5 of the NT Planning Scheme gives the Development Consent Authority the discretion to vary car parking requirements and density if justified. The intent and merit to increase density and vary car parking to enable affordable housing can be achieved without the need to change the zoning, as the current zone is for residential use.
- 1.4 The current zone (LMR) should therefore be retained to facilitate social and affordable housing

2. CENTRAL DARWIN AREA PLAN

- 2.1 The Area Plan identifies the land as a potential change to TC (Tourist Commercial). This Area Plan is a product of extensive community consultation that identified the land for TC. Whilst the application states that this was supported by YMC through its submission, it also gave confidence to the nearby community, as the current zoning and potential change had reasonable height restrictions.
- 2.2 The intention of the proposed rezoning, which entails provisions of HR (High Density Residential), invokes significant departure from the current zone and potential change under the Area Plan.
- 2.3 Larrakeyah is an established suburb with a distinct mixture of land zonings identified through the zoning map of the NT Planning Scheme and the potential areas of change under the Area Plan. The area between Mitchell and Houston Streets is mainly zoned HR, allowing for high-density residential development.

2.4 There is an adequate supply of HR zone to facilitate social and affordable housing without the need to amend the Area Plan in the locality. The subject sites should keep their current zoning and be developed accordingly.

3. SOCIAL AND AFFORDABLE HOUSING

3.1 The application statement states, "*The proposed specific use zone has been primarily based on the High Density Residential (HR) Zone, per Clause 4.5 of the Planning Scheme, however modified to apply specific car parking requirements to and allow the inclusion of ancillary administration space within a social and affordable housing development.*"

3.2 Since the land is zoned LMR, requirements for car parking and administrative spaces can be included in a social and affordable housing project through an Exceptional Development Permit (EDP), without requiring a zoning change.

3.3 The arguments supporting the necessity for social and affordable housing are valid and may be submitted to the Lands, Planning and Environment Minister through an EDP without requiring a change in zoning.

3.4 Although an EDP does not need to follow Part 5 of the Scheme, the proposal can largely align with the current zone while adjusting for car parking needs and including ancillary administration space in a social and affordable housing project.

4. CHALLENGES OF SOCIAL AND AFFORDABLE HOUSING

4.1 Both government and non-governmental organizations recognize a severe nationwide shortage of this housing type.

4.2 The subject site is available to address the need, but the proposed rezoning is not necessary since the land is already zoned for residential development.

4.3 Elevated concentrations of social housing may contribute to heightened stigma and perceptions of disadvantage; however, initiatives such as social housing renewal are designed to foster more integrated communities and mitigate these challenges.

4.4 Although this application is not for development, creating an HR zone may lead to a concentration of vulnerable populations with complex needs. The current site allows for a manageable number of homes; therefore, it's advisable to avoid high-density social and affordable housing to prevent potential issues.

5. DEGRADATION OF AREA AND DEVALUATION OF EXISTING PROPERTIES

5.1 The approval of rezoning of the current site will drastically change the nature of the area for existing residents and visitors. Increased traffic, increased noise and other detrimental effects will be felt directly by the existing property owners and residents.

5.2 The rezoning application has not considered the detrimental effects a future development of the proposed nature would have on the local community and residents.

5.3 Further, if a development of this nature is allowed to proceed, nearby properties would suffer a drop in their value as the fundamental character of this area has been detrimentally altered. The ability of residents to enjoy their homes and property will be severely diminished.

5.4 The intention of the developer seems noble, however the proposed site is not the correct location for this endeavour. The Minister should encourage the developer to seek a more appropriate location for their development and not ruin it for the local property owners and residents.

Attached to this letter is a list of owners and occupants of 2 Mauna Loa St, raising their strong objection to the proposed rezoning.

Kind regards,



Bethmini Daniel
The Committee Secretary
Body Corporate (UTS 2015/039)

Lot Number	Unit Number	Address Title1	Address Title2	Address Line1	Address Line2
10092	1a	Double G Nominees Pty Ltd atf	The Double G Super Fund	PO Box 3421	Joondalup WA 6027
10093	2a	Diamondfan Pty Ltd	PO BOX 37726	WINNELLIE NT 0821	
10094	3a	DIAMONDFAN PTY LTD	PO Box 37726	Winnellie NT 0821	
10095	101a	A Godinho	50A Kings Road	Five Dock NSW 2046	
10096	102a	Double G Nominees P/L Trustee	for Double G Super Fund	PO Box 3421	JOONDALUP WA 6031
10097	103a	Mr S Canobie	Defence Housing Australia	PO Box 4923	KINGSTON ACT 2604
10098	104a	Mr B Loughnan	PO Box 9374	BATHURST WEST NSW 2795	
10099	201a	Ms L Miller	41 Calala Court	Bonogin QLD 4213	
10100	202a	Mr M Bryan	277 Blacktown Road	Prospect NSW 2148	
10101	203a	Mr R & Mrs J Vonhoff	PO Box 4923	Kingston ACT 2604	
10102	204a	Ms Y Manners	U41 / 25 Park Road	WOY WOY NSW 2256	
10103	301a	Alison Jeanne &	Andrew Jason Brown	Unit 301A/2 Mauna Loa Street	Darwin City NT 0800
10104	302a	G & A Superannuation	PO BOX 37726	WINNELLIE NT 0821	
10105	303a	G & A Superannuation	PO BOX 37726	WINNELLIE NT 0801	
10106	304a	Diamondfan Pty Ltd	PO BOX 37726	WINNELLIE NT 0821	
10107	401a	Leonie Robyn Smith	GPO BOX 1585	DARWIN NT 0801	
10108	402a	DIAMONDFAN PTY LTD	PO Box 37726	Winnellie NT 0821	
10109	403a	Diamondfan Pty Ltd	PO BOX 37726	WINNELLIE NT 0821	
10110	404a	Diamondfan Pty Ltd	PO BOX 37726	WINNELLIE NT 0821	
10111	501a	Richard David Kearins	Unit 501A/2 Mauna Loa Street	Larrakeyah NT 0820	
10112	502a	Jennifer Nicole Webb	Unit 501A/2 Mauna Loa Street	Larrakeyah NT 0820	
10113	503a	DIAMONDFAN PTY LTD	PO Box 37726	Winnellie NT 0821	
10114	504a	DIAMONDFAN PTY LTD	PO Box 37726	Winnellie NT 0821	
10115	601a	Diamondfan Pty Ltd	PO BOX 37726	WINNELLIE NT 0821	
10116	602a	Ms A Mekellar & Mr J Huntley	2 BELMORE STREET	GOULBURN NSW 2580	
10117	603a	KIANG VU PTY LTD AS TRUSTEE	FOR MAUNA LOA 8	PO Box 78	Coolalinga NT 0839
10118	604a	S Chai	Unit 603A/2 Mauna Loa Street	Larrakeyah NT 0820	
10119	1b	Mr Steve Hindley	91 Forrest Street	NORTH PERTH WA 6006	
10120	2b	Mr A & Mrs S Gale	PO BOX 120	BERRY SPRINGS NT 0838	
10121	101b	Diamondfan Pty Ltd	PO BOX 37726	WINNELLIE NT 0821	
10122	102b	Mr D & Mrs K Walker	3 WILKINSON CRT	NUMURKAH VIC 3636	
10123	201b	DIAMONDFAN PTY LTD	PO Box 37726	Winnellie NT 0821	
10124	202b	Diamondfan Pty Ltd	PO BOX 37726	WINNELLIE NT 0821	
10125	301b	Sheryl Andrea Delbridge	115 Old Fish Creek Yanaki Road	FISH CREEK VIC 3959	
		Diamondfan Pty Ltd	PO BOX 37726	WINNELLIE NT 0821	

10126	302b	Diamondfan Pty Ltd	PO BOX 37726	WINNELLIE NT 0821
10127	401b	DIAMONDFAN PTY LTD	PO Box 37726	Winnellie NT 0821
10128	402b	DIAMONDFAN PTY LTD	PO Box 37726	Winnellie NT 0821
10129	501b	DIAMONDFAN PTY LTD	PO Box 37726	Winnellie NT 0821
10130	502b	Chi Tat Kwok	Unit 502B/2 Mauna Loa Street	Darwin City NT 0800
10131	601b	Diamondfan Pty Ltd	PO BOX 37726	WINNELLIE NT 0821
10132	602b	Diamondfan Pty Ltd	PO BOX 37726	WINNELLIE NT 0821
10133	701b	Mr M & Mrs T Ward	40/144 Smith Street	Darwin NT 0800
10134	702b	Diamondfan Pty Ltd	PO BOX 37726	WINNELLIE NT 0821

From: drosso lelekis <dlelekis@hotmail.com>

Sent: Tuesday, 30 September 2025 4:59 PM

To: Planning NTG <Planning.NTG@nt.gov.au>

Subject: Objection to Planning Scheme Amendment proposal PA2025/0283- Rezoning of Lots 5727 (121 Mitchell Street) and 3494 (12 Doctors Gully Road) for Social and Affordable Housing

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

To the Northern Territory Planning Commission,

As co-owners of a residential apartment at Catalina Apartments (directly next door to the proposed rezoning and intended subsequent development), we wish to formally register our strong opposition to any approval of Planning Scheme Amendment proposal PA2025/0283, which seeks the rezoning of Lots 5727 (121 Mitchell Street) and 3494 (12 Doctors Gully Road) in Larrakeyah from the current Low-Medium Density Residential (LMR) zoning to a Special Use (SU) zoning for the purposes of providing social and affordable housing on these sites. It is understood that the development proposal will be for 100 dwellings in a nine-storey building.

We strongly oppose any approval of this rezoning application on the following grounds:

LARGE DEVIATION IN DEVELOPMENT TYPE FROM WHAT THE EXISTING ZONING ALLOWS

The subject land is currently zoned Low–Medium Density Residential (LMR). This would allow a similar development to the next-door Catalina Apartments, both in size and type, with the same car parking requirements on-site as per the NT Planning Scheme requirements. The requested Planning Scheme Amendment seeks to place it in a Specific Use (SU) zone — to facilitate social and affordable housing and with a reduced car parking requirement on-site. The reality is, that there is no guarantee that the number of vehicles actually generated by the site will be within the requested reduced generation rate under the Planning Scheme Amendment. In a car-centric city such as Darwin, vehicles in excess of on-site parking capacity would park along Doctors Gully Road, thereby creating congestion and other traffic safety issues.

Any new buildings associated with the SU zone should not exceed the height limit allowed for the current LMR zoning (not more than four storeys). Otherwise, this will have significant impact on the existing Catalina Apartments' amenity in regard to reducing current views and breezes and other detrimental impacts of having a new tall building in very close proximity.

My sister and I bought our apartment with the current neighbouring property zoning in mind and approval of any rezoning that would allow a larger development than is permissible under the current zoning would be very unfair and damaging to our property.

It is noted that the Land Use Vision Map associated with the Central Darwin Area Plan (2019) shows Mixed Use (Commercial, Residential, Tourism, Recreation, etc) and Commercial and Tourism Commercial use in the subject sites for rezoning consideration. It is also noted that these uses shown the Central Darwin Area Plan (2019) are not automatically approved. The proposed use of the land under Planning Scheme Amendment proposal PA2025/0283 could not be considered Mixed Use or Commercial and Tourism Commercial, so is also not in line with this Area Plan.

LAND USE COMPATIBILITY AND PROXIMITY TO LICENSED PREMISES CONCERNS

The proposed development of social and affordable housing is likely to have a proportion of vulnerable inhabitants and its very close proximity to licensed premises in the area (e.g. bottle shop and bar/club) could be subject to risk due to easy access to alcohol. All sorts of social problems could then emanate from this, that would not only affect the new development, but also existing developments in the area. Antisocial behaviour as the result of close proximity to licensed premises would affect the liveability and quality of life of residents in the existing residential buildings in the immediate vicinity (particularly next door at Catalina Apartments).

The proposed land uses should be compatible to the existing residential land use in the area to ensure no loss of residential amenity to existing residents. It can be strongly argued that these two residential uses are not compatible.

The existing residential development in the area could be described as higher-end CBD living and the proposed residential land uses cannot be considered the same.

The area currently enjoys quiet and tranquillity, which could be significantly affected by resident behaviours that can sometimes be associated with developments containing social housing.

ALTERNATIVE SITE AVAILABILITY

The inappropriateness of this location for the proposed land uses is further highlighted by the availability of more suitable already established sites that could be further developed or redeveloped to provide greater capacity for social and affordable housing.

The Darwin CBD already has well-established social and affordable housing development sites, at least one of which is considerably under-developed. These are bounded by Smith, Cavenagh and Mitchell Streets. Redevelopment of these areas through densification, on existing road corridors that provide connectivity and public transport, would be a far better option for increasing the volume of this housing type within the CBD. Why does there need to be a further development of this type on the DCC periphery? Where is the data that supports this need for further such development right next to established CBD residential buildings in very close proximity?

The Darwin municipality also has numerous alternative locations outside of the inner city with superior physical and social infrastructure capacity, that would better support social and affordable housing.

STRATEGIC LAND USE AND PLANNING POLICY

As noted above, the proposed rezoning and subsequent development is not in keeping with that suggested within the Central Darwin Area Plan.

Prime inner-city land such as these subject sites should be allocated through comprehensive strategic planning rather than ad-hoc rezoning and development through establishment of a specific SU Zone. Approval of this ad-hoc approach would also set an unfortunate precedent.

This area is high-value residential land and a development of this nature would only put downward pressure on the value of the land and existing residential properties in the area, which is a massive concern for property owners such as ourselves and others who own property in the Catalina Apartments or nearby Sentinel development.

INFRASTRUCTURE CAPACITY

It is likely that the local physical infrastructure in the area is inadequate to also accommodate the proposed development at a large scale. The following would be of concern:

- Existing water pressure issues in the area will be exacerbated;
- Sewerage and electrical systems capacity concerns given the age of local infrastructure;
- Narrow street (Doctors Gully Road) could struggle to accommodate increased waste collection requirements and additional car parking (given the very low number of on-site bays proposed under the requested SU zoning);
- Emergency services access compromised by street width constraints and expected additional kerbside parking.

TRAFFIC AND ACCESS CONCERNS

The proposed development location presents serious traffic and access challenges, such as:

- The street is notably narrow with limited width for safe two-way traffic flow;
- Insufficient turning circles for emergency vehicles, waste collection, and delivery trucks;
- Limited on-site parking will force overflow parking onto an already constrained street, thereby increasing congestion and reducing overall road safety (including pedestrian safety);
- Potential for traffic bottlenecks or congestion affecting existing residents' access to their properties.

ECONOMIC IMPACT ON LOCAL AREA

The proposed development raises concerns about broader economic impacts:

- Potential negative effect on surrounding property values due to both overdevelopment and also the type of proposed development (not compatible with the existing residential land use);
- Significant risk of anti-social behaviours emanating from social housing that would also detract from existing property values (noting also licensed premises serving or allowing the purchase of alcohol in close proximity);
- Traffic congestion and parking issues may deter visitors from visiting existing residents;
- Incompatible land uses will very likely affect the area's residential market appeal and result in drops in property value;
- My sister and I purchased an apartment in Catalina at the time of completion (2024), which was at the height of the short-lived "Impex Boom" . Due to the serious oversupply of apartments in the CBD after this "Boom", property values in this area have been dropping ever since and the value of our property now, 11 years after purchase, has still not recovered to the original purchase price. If you factor in 13 interest rate rises in 13 months, with some financial relief only recently arriving due to modest and very few interest rate cuts, a development of this nature being built next door to our property would severely damage its value and also of other units within the two well-established residential buildings in the immediate area. This is very unfair to impose on long-time local property owners, many of who are long-time Territorians (such as my sister and I).

ENVIRONMENTAL AND AMENITY IMPACTS

The development poses several environmental concerns:

- Blocking of views and breezes, due to the proposed the height of the new building (nine storeys);
- Noise pollution during construction and likely from the social housing land use-so close to the Catalina Apartments.
- Absence of appropriate buffer zones between these very different housing types.

Any approved development must be kept to the height and scale permissible under the existing Low-Medium Density Residential (LMR) zoning (no more than four storeys in height).

PARKING REDUCTION WITHOUT EVIDENCE

The Specific Use proposed sets parking at 0.7 spaces for a one-bedroom dwelling, 1.05 for two bedrooms and 1.19 for three bedrooms, plus a small allowance for administration space, on the assumption that social or affordable housing tenants will own fewer cars. No data has been provided to support this claim. These reductions should not be written into the rezoning without proper studies.

CONCLUSION

For the above reasons, we ask that the Northern Territory Planning Commission refuse this Planning Scheme Amendment and require the applicant to consider alternative sites should they wish to proceed with such a development.

The development as proposed is totally incompatible with the existing residential and other land uses in the in the area and would create ongoing problems for existing residents/property owners and compromise the safety and amenity of the local area.

The scale of the proposed development is also not in-line with the existing zoning for the site, which has been in place since construction of the Catalina Apartments.

Most importantly, the proposal has the capacity to severely damage the value of our and other residential properties in the area, thereby damaging the financial future of hard-working Territorian owners, who purchased property in good faith and expectation that such a rezoning application and development in very close proximity would never be approved.

We trust that you will give due consideration to our concerns when determining this application.

Yours sincerely,

Ms Samantha Lelekis

39 Meigs Crescent,

Stuart Park, Darwin, NT

30 September 2025

and

Mr Drosso Lelekis

Unit 1, 19 Westralia Street,

Stuart Park, Darwin, NT

30 September 2025

Objection to YWCA Re-zoning

Application No. PA2025/0283 for 121 Mitchell Street and 12 Doctors Gully Rd Larrakeyah (Lots 5727 and 3494).

(LMR) Low – Medium Density Residential Zone

(SU) Specific Use Zone

(DV) Development Application

(HD) High Density Residential

1. Current Zoning. LMR to specific use SU Zone (category applies to these 2 lots only)

Requested to be developed as HD Zone with catastrophic severely reduced car parking requirements which is being requested without the as normally provided supporting documentations. When (DV) is lodged the authority cannot question or change this aspect. As no other HD standard are not defined in the re-zoning information, we the local community have only a small part of the picture. This also has the potential to create a precedent for other developers to follow and succeed.

The authority must realise that local parking facilities in Lower Mitchell St and Doctors Gully are currently congested. This will further exacerbate this issue to a dangerous point causing possible accidents and injury to women and children accessing vehicles or shopping etc.

I give further reasons supporting my objections to this development either by YWCA or if sold to a commercial developer who will have their own agenda.

2. Uncertain as to the actual “scale” of this proposal, ie Site 5727 Mitchell St. Doctors Gully Rd site 3494. Issues are - actual building height, setbacks, site coverage with open space, garden green areas in this potential HDR development. Safety is a major concern. Overall environment must factor into any development. Additional residents and their visitors’ impact warrants investigation.
3. Neighbourhood /Larrakeyah.
This area outside the CBD is predominately family residential (including the Esplanade dwellings). Some Mitchell St buildings in this area are up to 9 stories, whilst Doctors Gully area have much lower scale dwellings. Larrakeyah has residential occupancy moving down to the Larrakeyah Army Base. Let us also not diminish the impact of this structure and occupants on the next-door Child Care Centre in Mitchell St.
No effort has been made by this possible developer to manage these issues and in fact appears to deliberately ignore broadcasting detail of these issues.
4. The issue of reduced parking MUST never be approved at any application and certainly not in this already congested and residential area. SU special conditions are normally given strictly on a case by case basis with evidence to support.

5. I have touched on the impact on the 59 Children Child Care Centre right next door in Mitchell St. There could arise real potential of health and safety to this area from issues such as :
 - increased traffic density
 - construction impacts over what 12 to 18 months total height, overshadowing which may result in dis-orientation for some children.
 - drop off and pick up of these children (peak traffic times) will become a dangerous although necessary function with potential for severe accidents to occur with women and children residents.
6. Actual consultation with local residents appears non existing or at least minimal. I for one living very nearby was not consulted or made aware of this development until recently and certainly not by direct means.
7. This YWCA submission, if approved, would appear to seriously weaken the integrity of the Planning Scheme as it used one off SU severely weakening the full obligation of the HR structure particularly in regard to drastically reducing the parking space requirements.

REQUEST

I ask that the commission refuse this YWCA Submission PA 2025/0283 unless –

- Maximum height, setbacks (both sites), open space, landscaping etc included in SU Zone ie Full open disclosure of all aspects of this proposed development.
- Parking rates including visitation parking be restored to full HD standard as a minimum to this area.
- Child safety and care in the adjacent Child Care Centre, are addressed including peak drop off and pick up. (times and “safe” area) – particularly during and after construction.
- Consultation outcomes are published as with full pre-construction data, time frames of various construction phases, traffic management (passing and local).
- How impact on surrounding venues (including Child Care Centre) will be addressed and managed).
- My reading of what limited information was available is that YWCA has yet to advise if significant funds are available for these projects at their 2 sites. The indication seems to be that when/if approved from LMR to Specific use (SU) Zone with resulting concessions THEN – YWCA if their funds are not available, they will/may sell both lots to any private developer. This does also transfer SU Zoning with concessions to a private developer to develop what they wish to the possible detriment of local residents and their properties. This is to be avoided at all costs by the Planning Authority.
- This proposed new complex as stated is for disadvantaged women with their children.
Should husbands or partners appear on site, this could escalate into a domestic violence situation , thus endangering and potentially threaten the residents, the adjacent Child Care Centre and local area traffic.

- Proximity of these proposed YWCA developments to the Central Business District (CBD) is also a serious factor to be considered.

Finally, if SU Zoning with damaging conditions are approved for these sites, this approval MUST be conditional on site(s) development by YWCA for disadvantaged families ONLY.

I feel this SU Zoning approval for the above sites MUST be extinguished on these sites being sold by YWCA to any private developer. These two sites, 5727 Mitchell St and 3494 Doctors Gully Rd MUST revert back to their original LMR Zoning. This could well prevent exploitation of these sites to the detriment of current residents and maintain consistent development standards for the future.

I reiterate, that these two sites are physical constrained, especially the Doctors Gully Road/area. Safety and traffic management is already a concern to residents.

I await your response

Yours sincerely

AD Brown

29 September 2025

From: [Nicholas Kirlew](#)
To: [Das NTG](#)
Subject: PA2025/0283
Date: Thursday, 2 October 2025 4:09:55 PM

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PA2025/0283

To the NT Planning Commission,

I wish to object to the proposed amendment PA2025/0283, which seeks to rezone Lots 5727 and 3494 (121 Mitchell Street and 12 Doctors Gully Road) from Low–Medium Density Residential (LMR) to a Specific Use (SU) zone.

Reasons for objection

Height and setbacks not transparent

The SU points to the High Density Residential (HR) zone but does not print any numbers for maximum height, setbacks, site coverage, deep soil planting, or open space. This leaves residents uncertain about what scale of development will be allowed.

Neighbourhood context not addressed

The Mitchell Street frontage includes taller buildings (such as the nine-storey Catalina Apartments), while Doctors Gully Road and adjacent lots include much lower-scale dwellings, including a detached house at No. 12. The SU provides no clear transition controls to manage this mixed context.

Parking reduced without evidence

The SU locks in reduced parking rates (0.7 / 1.05 / 1.19 per dwelling) on the assumption that social housing tenants will own fewer cars. No data has been provided to support this claim. There is also no plan for visitor parking or alternatives such as bicycle facilities. These reductions should not be written into the rezoning without proper studies.

Child safety concerns

The Mitchell Street Child Care Centre operates next door at 127 Mitchell Street, licensed for around 59 children. The rezoning documents do not mention this sensitive use. Increased traffic, construction impacts, and overshadowing could directly affect children's safety and amenity.

Consultation not transparent

The Consultation Summary does not say how many residents were contacted, what concerns they raised, or what changes were made. Without this information, it is impossible to judge whether consultation was genuine.

Planning Scheme integrity

If high-density outcomes are intended, the correct process is to rezone to HR so that all HR standards apply. Using a one-off SU that imports HR while weakening obligations undermines the consistency of the Planning Scheme.

Infrastructure and climate design missing

The rezoning does not commit to how stormwater, shading, deep soil planting, or canopy cover will be managed, despite sewer easement notes. These issues should be addressed now, not left for later.

Request

I ask that the Commission refuse this amendment unless:

- Maximum height, setbacks, open space, and landscaping standards are printed in the SU zone;
- Parking rates are supported by proper studies, including visitor parking;
- Child safety and childcare adjacency are addressed;
- Consultation outcomes are published; and
- Stormwater, heat-mitigation, and canopy plans are provided.

Regards,

Nick Kirlew

Convener PPlan: the Planning Action Network Inc

0447 499 794

Email: nick@planinc.org.au

Web: <https://www.planinc.org.au>

PA2025/0283 - Planning Scheme Amendment Application - Objection

I, Nicola Jackson of 43/10 Doctors Gully Road Larrakeyah wish to submit my objection to PA2025/0283 for the following reasons:

1. Visibility of a safety shelter for vulnerable people

The application states there are “no dedicated purpose-built housing for victim-survivors of family and domestic violence has been developed in Darwin or surrounding area” (p3). This is not an accurate statement Dawn House and DAIWS provide secure crisis accommodation in Darwin.

The level of exposure and accessibility that will be available to the alleged abusers will be extensive. The land is extremely visible and accessible; there are transport links right outside the land making visiting the location a simple process. There are locations surrounding the land that have violent and transient populations that the victims will be confronted with and will negatively affect their recovery.

In simple terms, this land is not appropriate to provide a supportive and secure environment that provides services and protection from further abuse. Any facility that is to provide a safe environment should be in a location that is not easily seen and accessible by the public, on a main road and within a city limit. It should be within a safe neighbourhood that was limited access points and provides access to services such as medical and school without exposing the person to more anti-social and violent behaviours.

2. Consultation

The consultation undertaken was tokenistic at best to merely ‘tick the box’. The public vocalised their concerns that were valid and the commentary back from the consultation that is documented was non-responsive and not a good faith consultation process to work through issues and find solutions to progress the proposal.

A truly open process would embrace the feedback from the community consultation and offer mitigations to alleviate concerns raised. This has not been done which leads community residents to believe they are not being heard, and their relevant feedback is dismissed and not considered in broader community awareness.

Selfishly, I would argue the construction of such an institution in my area is highly likely to reduce the value of my property. I am not unaware of the struggles people accessing these services need, however, my purchase and its value should be given equal consideration, it will no doubt attract additional people, potentially violent (which is highly probable given those seeking shelter here are escaping family and domestic violence) which means the areas becomes less desirable and therefore lowers the value of property in the area.

3. Neighbourhood Character

The proposal states: ‘The proposed amendment will facilitate a building height (up to 8 storeys) and type (dwelling-multiple) consistent with existing buildings in Zones HR, CB and TC in the immediate locality, including land immediately adjacent the subject site.’

This is factually incorrect. Where the building is being proposed is on the Larrakeyah neighbourhood side. It is all low level residential all the way from 117 Mitchell Street to the end to Cullen Bay. This is neighbourhood living. Across the road of Mitchell Street, yes it is high density living but this is City zoned and NOT Larrakeyah.

Any high rise living on the proposed site would impact on the characteristics of the neighbourhood and would not positively contribute to the neighbourhood. It would impact on accessing the old Larrakeyah Well and Doctors Gully Walking paths, it would impact on one of the oldest neighbourhoods in Darwin.

4. Parking (traffic management)

The proposal to reduce parking is short sighted and not considering the already congested road on Mitchell Street as a main road in and out of the City and Doctors Gully Road being used as a parking bay by city workers during the day. The lack of acknowledgement of support services that will need access to parking and the limited access of the Doctors Gully Road to be an additional service road. Doctors Gully Road is narrow, turns into a one-way street heading towards Doctor Gully with a blind corner and descending hill and has a park at the end that runners and families use daily.

The impact on traffic management and pedestrian and driver safety have not been fully considered with the high-density living arrangement that is being proposed. It cannot cope with increased density living and the statement at page 22 that states: 'The site has a relatively wide frontage to both Mitchell Street and Doctors Gully Road which provides opportunity' is not factually correct. The Doctors Gully Road is narrow and fully occupied during the day as stated above.

In addition to the above, it poses and ongoing traffic safety risk to young people in the suburb. There is a childcare centre in proximity and the school just down the road. The increased level of traffic in this already congested area raises serious concerns for child welfare and safety.

The parking MUST be made available for the one per unit as per the Darwin city by-laws and these will no doubt be utilised by staff required to operate the centre, services delivered by specialists and other community organisations at the location and it is short sighted to believe that persons accessing the property are unlikely to have a vehicle. They are facing domestic violence struggles, it does not mean they are low socio-economic or without their own transport. Anything less than full parking increases risk to community members.

5. Impact on current services

There has been no consideration of the impact of the existing services, such as the local schools, childcare, infrastructure, transport and other auxiliary services.

If the NT Government are serious about their election commitment and pillar to 'Restore the Territory lifestyle' these things need significantly more consideration. I and other community members moved to this neighbourhood for the quiet serenity and enjoyment of inner city living.

The need for these additional services will diminish my accessibility of those services over utilised without appropriate consideration or will enhance them to a level where my quiet enjoyment of the property I own is diminished.

6. Impact on social safety

To propose such a residence with such a high volume of residences has not considered social safety and the lack of 24/7 police, security and first responder services.

The location already has a high transient population, including drunks, meth addicts and other substance abusers, human predators that have violent outbursts, mental health

issues, hunt for vulnerable or intoxicated people to assault, rob or violate. This proposal is wanting to introduce another layer to this anti-social behaviour that is unacceptable and will impact the intention of providing a safe and secure residence.

These kinds of dwellings as articulated previously are better in more remote areas, not remote in the true sense of the word but not within the inner-city area. While the access to services may be easier (they can be delivered further afield) it brings a raft of additional problems which most would be better mitigated by such a construction taking place further out of the city which means police then have an ability to act as they have 'wilfully' gone to the location.

Its proposed location does not provide safety to occupants of residents near by as an offender could 'walk by' and the police would have little to detain the offender as they could quite reasonably be just 'walking by'. This means real and intent of the visitation is difficult to question when the property position is so easily accessible in the city.

7. Proximity to alcohol and licenced venues

The proposed land is identified for victim-survivors of family and domestic violence. Over 50% of domestic violence assaults in the Darwin area are alcohol related (refer Crime Statistics published July 2025). A residence being so close to take away alcohol and licensed venues puts the residence in a dangerous environment and more likely to be assaulted again. The lack of attention put on the offender trait behaviours and not mitigating accessibility is concerning. Not just to the victims but also the local residence that include young families, elderly and childcare centres.

Yours sincerely



Nicola Jackson

29 September 2025

Mario Tsirbas
4 Godfrey Court
Larrakeyah NT 0820

Development Consent Authority
Northern Territory Government
GPO Box 1680
Darwin NT 0801

Dear Members of the Development Consent Authority,

Re: PA2025/0304 - Objection to Rezoning Application for Former Hostel Site at 121 Mitchell St – From LMR to Specific Use (High-Rise Residential for Transitional Accommodation)

I am writing as a local resident of Larrakeyah, living in close proximity to the former hostel site subject to the current rezoning application. I strongly object to the proposed rezoning of this site from its current height limit of 2-3 storeys to allow for high-rise residential development, particularly given the stated purpose of providing transitional accommodation for victims of domestic violence. While I fully support initiatives to assist vulnerable individuals in our community, I believe this location is entirely unsuitable for such a development, and the rezoning should be rejected.

My objections are based on several key concerns, which I outline below:

1. Proximity to a Child Care Centre: The site is located immediately next door to an existing child care centre, which serves young children and families in the area. Introducing high-rise transitional accommodation in such close proximity raises significant safety and welfare issues. The potential for increased foot traffic, unfamiliar visitors, and unpredictable interactions could compromise the secure environment essential for child care operations. This rezoning risks exposing vulnerable children to unnecessary hazards and could deter parents from using the facility, impacting its viability.

2. Increased Traffic and Congestion: The Darwin CBD fringe is already experiencing growing traffic pressures, with narrow streets and limited parking options. A high-rise development would inevitably lead to a surge in vehicle movements, including from residents, support services, visitors, and delivery vehicles. This could exacerbate congestion, increase accident risks, and strain local road infrastructure that is not designed for such intensification. As a

resident, I am concerned about the daily disruptions this would cause, including noise, pollution, and reduced accessibility for emergency services.

3. Potential for Anti-Social Behaviour: Transitional accommodation, while vital, can sometimes be associated with challenges such as anti-social behaviour, especially in high-density settings without adequate on-site management. The site's location in a residential fringe area, rather than a more controlled or supported urban hub, heightens this risk. Nearby residents, including families and elderly individuals, could face disturbances like noise complaints, loitering, or other issues that erode the community's sense of safety and cohesion. This is not an appropriate setting for a facility that may require specialized oversight to mitigate such outcomes.

4. Reduction in Local Property Values: The introduction of high-rise transitional housing in this low-rise residential zone would likely depress land and house values for surrounding properties. Homeowners and investors in the area have relied on the existing zoning to maintain a stable, family-oriented neighbourhood character. A shift to high-density development could alter the aesthetic and functional appeal of the locale, leading to decreased market interest and financial losses for long-term residents like myself. This rezoning appears to prioritize short-term needs over the long-term economic stability of the community.

5. Availability of More Suitable Sites: There are numerous alternative locations across Darwin and the Northern Territory that are far better suited for transitional accommodation. Sites with closer proximity to essential infrastructure—such as public transport hubs, medical facilities, counselling services, employment centres, and community amenities—would provide greater support for residents in need. For instance, areas within the CBD core or near established social service networks could offer better access to resources without imposing on quieter residential fringes. Rezoning this particular site overlooks these more appropriate options and fails to consider the broader planning implications for balanced urban development.

6. Environmental Impacts on Adjacent Micro Rainforest: The proposed site is adjacent to the micro rainforest at Doctors Gully, a unique ecological oasis characterized by dense rainforest vegetation and serving as a vital habitat in the urban landscape. High-rise development could cause significant disturbances to the local water table through excavation, construction activities, and increased impervious surfaces from the building footprint. This might reduce the water supply to this sensitive area, including historic features like Peel's Well, Darwin's original water source, leading to potential degradation of the rainforest ecosystem, loss of biodiversity, and long-term environmental harm. Such impacts would contradict efforts to preserve Darwin's natural heritage in an area already under pressure from urbanization.

7. Impact on Nearby Fish-Feeding Tourist Facility: Doctors Gully hosts the renowned Aquascene fish-feeding tourist facility, a protected marine sanctuary where visitors hand-feed wild fish during high tides, contributing significantly to local tourism and the economy. The rezoning and

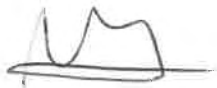
subsequent high-rise construction would introduce noise, visual obstruction, dust, and potential runoff pollution, disrupting the tranquil environment essential for this attraction. This could diminish visitor experiences, reduce attendance, and threaten the facility's operations, undermining a key cultural and recreational asset in the Darwin CBD fringe.

In conclusion, while the intent behind providing transitional accommodation for domestic violence victims is commendable, the proposed rezoning of this former hostel site is misguided and detrimental to the local community. It disregards the site's unsuitability due to its proximity to sensitive facilities, potential impacts on traffic, safety, property values, the environment, and tourism, as well as the availability of better alternatives. I urge the Development Consent Authority to reject this application in its entirety and encourage the applicants to explore more fitting locations that align with community needs and strategic planning principles.

I would appreciate the opportunity to discuss my concerns further or provide additional information if required. Please keep me informed of any hearings or decisions related to this matter.

Yours sincerely,

Mario Tsirbas

A handwritten signature in black ink, appearing to be 'Mario Tsirbas', written over a horizontal line.

22/9/25

Skye Cochrane

702b/2 Mauna Loa St
Darwin NT 0800

Date: 2nd October 2025

To: Development Assessment Services
Department of Infrastructure, Planning and Logistics
GPO Box 1680
Darwin NT 0801

Subject: Objection to Rezoning Application – PA2025/0283 - Planning Scheme Amendment

Dear Development Assessment Services,

As a long-time resident and neighbour in the area surrounding 121 Mitchell St, I am writing to express my strong concerns about the proposal to rezone this site to allow for the development of social and affordable housing.

I want to be clear that I support the need for more housing options in the Northern Territory—especially for people doing it tough. But I also believe these developments need to be thoughtfully planned and properly located. In this case, I don't believe this site is the right fit, and many of my neighbours feel the same way.

Disruption to an Already Stretched Community

This part of Darwin is already feeling the pressure from ongoing growth and development. Roads like Daly Street and Mitchell Street are often congested, especially during peak times. Parking is limited, public transport is inconsistent, adding a large residential complex will only increase the demand—without any sign that infrastructure is being improved to match.

Impact on Neighbourhood Character

Our neighbourhood sits at the edge of the CBD and has its own unique mix of older homes, low-rise apartments, and small businesses. People move here because it feels like a community, not a high-density extension of the city. A sudden shift in zoning, particularly for high-density or government-supported housing, risks changing the look and feel of the area in ways that haven't been discussed or planned for.

Property Value Concerns

Like many residents, I've worked hard to buy and maintain my home in this area. When zoning changes are pushed through, it creates a lot of uncertainty—not just about the

type of development, but also about how it might affect the value of our properties. We've made investments based on current zoning and expectations, and it's not fair for those conditions to change overnight.

There Are Better Locations

There's no doubt Darwin needs more social and affordable housing, but not all locations are suitable for every type of development. Areas like Palmerston, Berrimah, or parts of the CBD itself already have the infrastructure, transport links, and services that make higher-density housing more viable and sustainable. Pushing it into areas that aren't equipped just sets people up to fail—residents new and old alike.

In closing, I urge you to take a step back and properly consider the long-term impacts this rezoning could have—not just on traffic and services, but on the people who call this neighbourhood home. We aren't opposed to change, but we are asking for smart, inclusive, and balanced development that strengthens communities rather than divides them.

Thank you for taking the time to consider this letter.

Sincerely,

Skye Cochrane

1 October 2025

Director, Development Assessment Services
Department of Infrastructure, Planning and Logistics
GPO Box 1680, Darwin NT 0801
Email: das.ntg@nt.gov.au (or as per the notice)

Objection to Proposed Planning Scheme Amendment – Lots 5727 & 3494 Town of Darwin (121 Mitchell Street & 12 Doctors Gully Road, Larrakeyah) Application Number PA2025/0283

Dear Director,

We write as the owner and landlord of a sixth-floor apartment directly opposite the subject site to lodge a formal objection to the proposed amendment to rezone Lots 5727 and 3494 from LMR (Low-Medium Density Residential) to Specific Use (SU) to facilitate a multi-storey social and affordable housing development.

1. Building Height and Visual Impact

The proposal anticipates a building height of up to eight storeys, which is significantly higher than the current LMR zoning allows. Our property currently enjoys a valuable ocean and sunset outlook—a key aspect of its amenity and market value. An eight-storey structure across Mitchell Street would block those views, reduce natural light, and dominate the existing streetscape. This is inconsistent with the Central Darwin Area Plan's intent to manage height transitions between the CBD and the lower-density Larrakeyah neighbourhood.

2. Amenity, Traffic and Parking

Although the application refers to reduced on-site car parking based on its proximity to the CBD, the scale of the development will inevitably increase traffic and on-street parking demand along Mitchell Street and Doctors Gully Road. The latter is a narrow road reserve and already experiences congestion and limited kerbside parking. The intensified use risks overflow parking, congestion and diminished pedestrian safety.

3. Property Value and Economic Impact

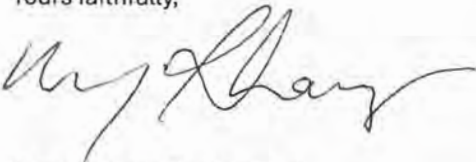
Loss of views, overshadowing, and increased traffic directly affect the market attractiveness and rental returns of surrounding properties, including mine. Such material impacts can lead to a measurable reduction in property value, which is a recognised planning consideration when it flows from legitimate amenity impacts.

Conclusion

We respectfully request that the Minister and the Development Consent Authority refuse this amendment or require substantial modifications—such as reducing the permitted height and increasing on-site parking provision—to protect the established character, views, and amenity of the locality.

Thank you for considering this submission.

Yours faithfully,



Kenwood and Rachelle Lay
PO Box 78, Coolalinga NT 0839

kenny@sfsnt.com.au shellie@sfsnt.com.au

Owner, 602A/2 Mauna Loa Street, Darwin City, NT 0800

Subject: Objection to Planning Scheme Amendment PA2025/0283

To the Development Assessment Services,

I am writing to formally object to Planning Scheme Amendment PA2025/0283 regarding Lots 05727 and 03494, 121 Mitchell Street and 12 Doctors Gully Road, Larrakeyah.

As a resident of the same street, I have serious concerns about the rezoning of the land from Low-Medium Density Residential (LMR) to Specific Use (SU) to facilitate a large-scale development for social and affordable housing. While I acknowledge the importance of providing housing options, the scale and location of this proposal are inappropriate for this site for the following reasons:

1. Excessive Height and Scale

The proposal is far too large and high for this location. It will dominate the surrounding area, overshadow neighbouring properties, and significantly reduce privacy and amenity.

2. Traffic and Parking Impacts

Increased density will create further congestion and parking pressures on local streets, which are already constrained. This is particularly concerning given the site's proximity to a childcare centre, where safe access and reduced traffic risks are essential.

3. Child Safety and Amenity

Locating such a high-density development next to a childcare facility raises significant concerns about safety, noise, and traffic conflicts. The intensity of the proposal is incompatible with the sensitive nature of neighbouring land uses.

4. Neighbourhood Character

Rezoning to permit such a large development would be inconsistent with the established low-medium density character of the area. It risks eroding the residential amenity that current planning controls are designed to protect.

5. Precedent for Future Development

Approval of this amendment will set an undesirable precedent, opening the way for further large-scale developments in inappropriate locations.

For these reasons, I strongly oppose the proposed rezoning and respectfully request that the Authority refuse the amendment or require a significantly reduced and more suitable scale of development in keeping with the existing residential and community uses.



Yours Faithfully

Tina Griffiths

Subject: Objection to PA2025/0283 – Planning Scheme Amendment
(12 Doctors Gully Rd & 121 Mitchell St, Larrakeyah)

To: Development Assessment Services
City of Darwin / NT Planning Commission

Dear Sir/Madam,

I am writing to formally object to Planning Scheme Amendment **PA2025/0283**, which proposes to rezone Lots 03494 and 05727 (12 Doctors Gully Rd & 121 Mitchell St, Larrakeyah) from **LMR (Low-Medium Density Residential)** to **SU (Specific Use)** to facilitate social and affordable housing.

While I fully support the principle of providing more social and affordable housing in Darwin, this proposal is inappropriate for this location and would have a negative impact on the Larrakeyah community for the following reasons:

1. Loss of Residential Character

Larrakeyah is a low-to-medium density residential area with a unique heritage character and village-like feel. Allowing a "Specific Use" zone here undermines the intent of the existing LMR zoning, which was designed to protect this balance. Rezoning sets a dangerous precedent, opening the door to further ad-hoc developments that could erode the area's residential amenity and liveability.

2. Conflict with NT Planning Scheme Objectives

The current LMR zoning exists to provide a low-to-medium density residential environment that is safe, liveable, and consistent in scale with surrounding properties.

- Clause 5.1 (Strategic Planning Principles) of the NT Planning Scheme requires development to be "compatible with the existing and future character of the locality."
- Clause 6.2.1 (Residential Zones Purpose) seeks to "maintain amenity, privacy, and solar access for existing and future residents."

Rezoning to Specific Use removes these controls, allowing potentially intensive development that will compromise residential character, amenity, and the expectations of existing residents who purchased in good faith under LMR zoning.

3. Overdevelopment Concerns

"Specific Use" zoning gives the developer significant flexibility with height, density, and design controls. This creates uncertainty for residents and may result in a development that is out of scale with surrounding homes and apartments, overshadowing existing dwellings, removing natural light, and severely impacting privacy.

4. Traffic and Parking Impacts

Doctors Gully Road and Mitchell Street are already under pressure, with limited on-street parking and high traffic volumes, particularly during peak hours and tourist season. A large housing development would significantly increase congestion, parking stress, and road safety risks, especially for pedestrians and cyclists.

- Additional housing density will exacerbate traffic volumes, increasing the risk of collisions.
- On-street parking is already under significant pressure; this development risks spillover parking into neighbouring streets.
- The area lacks sufficient pedestrian infrastructure to safely accommodate increased movements from a high-density development.

These impacts directly conflict with Clause 5.2 of the NT Planning Scheme, which calls for “safe and efficient movement networks” that do not adversely impact residential amenity.

5. Environmental and Amenity Impacts

This part of Larrakeyah has significant tree cover and contributes to the urban cooling of the area. Intensive development risks loss of mature trees, green space, and biodiversity, reducing the neighbourhood’s visual amenity and worsening the urban heat island effect.

6. Community Safety & Childcare Proximity

There is a childcare facility immediately adjacent to the proposed site. High-density or transitional housing, without clear management protocols, raises legitimate concerns about:

- Increased foot traffic and loitering in an area frequented by children and families.
- Safety risks for vulnerable road users, including children, parents, and pedestrians.
- Potential exposure to antisocial behaviour from visitors or residents if proper social support and security measures are not in place.

The NT Planning Scheme emphasises the importance of “safe and convenient access for pedestrians and cyclists” and development that “minimises potential conflicts between land uses.” This proposal does the opposite.

7. Existing Antisocial Behaviour, Violence & Police Call-Outs

The Larrakeyah area already experiences:

- Frequent police call-outs for disturbances and alcohol-related incidents.
- Violent altercations, assaults, and property damage, particularly at night.
- Public drunkenness, intimidation, and vandalism affecting residents, tourists, and businesses.

Concentrating more high-density or transitional housing in this location without robust security, management, and social support measures will amplify these issues, placing further strain on police, emergency services, and council resources.

8. Proximity to Doctors Gully & Risk of Antisocial Behaviour

The site backs onto historically significant Doctors Gully, a known gathering place where antisocial behaviour, public drinking and littering already occur. Higher-density development here risks:

- Amplifying existing social issues and call-outs.

- Reducing perceived and actual community safety, particularly at night.
- Detracting from the tourism and environmental value of Doctors Gully, which is a historic site and gateway to the waterfront.

9. Access to Alcohol Risk

There are several licensed venues and bottle shops within walking distance of the proposed development site. This creates a high-risk environment for alcohol-related harm, including:

- Increased likelihood of public drinking and intoxication spilling into surrounding streets, open spaces, and Doctors Gully.
- Greater potential for noise disturbances, vandalism, and property damage, particularly late at night.
- A clustering effect that exacerbates existing community safety concerns.

The NT Planning Commission must consider the cumulative impact of alcohol availability when assessing rezoning proposals, as recommended by the NT Alcohol Policies and Legislation Review (Riley Review).

10. Existing Social Services – Cumulative Impact

The Silos Roberts Hostel, a transitional housing facility, is located nearby. The area is already providing a substantial share of Darwin’s social and transitional accommodation. Adding another significant facility here will:

- Concentrate social housing in one small area, contrary to best practice planning, which calls for integration across multiple suburbs to avoid overburdening any single neighbourhood.
- Intensify demands on local infrastructure, open space, and community safety resources.
- Increase the risk of antisocial behaviour “hotspots,” further impacting residents and visitors.

11. Better Locations Are Available

Social and affordable housing should be integrated sensitively into the urban fabric, with access to public transport, services, and employment. Other sites closer to the CBD or on already-zoned higher-density land would be far more suitable, avoiding the destruction of existing residential neighbourhood character.

12. Lack of Community Consultation

This amendment was placed on exhibition for a limited period with minimal community awareness. Residents must be properly consulted on a proposal of this scale and impact, with clear details of height, number of dwellings, parking provisions, and design. Rezoning without this transparency is unacceptable and represents poor planning practice.

Conclusion

For the reasons outlined above, this amendment is contrary to the intent of the NT Planning Scheme, threatens community safety and amenity, and risks setting a precedent for inappropriate rezonings in Larrakeyah.

I urge the Planning Commission to refuse **PA2025/0283** and retain the current **LMR zoning**. Darwin needs more housing — but it must be well-planned, context-sensitive, and respectful of existing communities.

Sincerely,

A handwritten signature in black ink, appearing to read 'Nicho Peters', with a stylized flourish at the end.

Nicho Peters
5 Bambra Cres Larrakeyah

Subject: Objection to PA2025/0283 – Planning Scheme Amendment
(12 Doctors Gully Rd & 121 Mitchell St, Larrakeyah)

To: Development Assessment Services
City of Darwin / NT Planning Commission

Dear Sir/Madam,

I am writing to formally object to Planning Scheme Amendment **PA2025/0283**, which proposes to rezone Lots 03494 and 05727 (12 Doctors Gully Rd & 121 Mitchell St, Larrakeyah) from **LMR (Low-Medium Density Residential)** to **SU (Specific Use)** to facilitate social and affordable housing.

While I fully support the principle of providing more social and affordable housing in Darwin, this proposal is inappropriate for this location and would have a negative impact on the Larrakeyah community for the following reasons:

1. Loss of Residential Character

Larrakeyah is a low-to-medium density residential area with a unique heritage character and village-like feel. Allowing a "Specific Use" zone here undermines the intent of the existing LMR zoning, which was designed to protect this balance. Rezoning sets a dangerous precedent, opening the door to further ad-hoc developments that could erode the area's residential amenity and liveability.

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Rezoning to Specific Use removes these controls, allowing potentially intensive development that will compromise residential character, amenity, and the expectations of existing residents who purchased in good faith under LMR zoning.

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- Additional housing density will exacerbate traffic volumes, increasing the risk of collisions.
- On-street parking is already under significant pressure; this development risks spillover parking into neighbouring streets.
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These impacts directly conflict with Clause 5.2 of the NT Planning Scheme, which calls for “safe and efficient movement networks” that do not adversely impact residential amenity.

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There is a childcare facility immediately adjacent to the proposed site. High-density or transitional housing, without clear management protocols, raises legitimate concerns about:

- Increased foot traffic and loitering in an area frequented by children and families.
- Safety risks for vulnerable road users, including children, parents, and pedestrians.
- Potential exposure to antisocial behaviour from visitors or residents if proper social support and security measures are not in place.

The NT Planning Scheme emphasises the importance of “safe and convenient access for pedestrians and cyclists” and development that “minimises potential conflicts between land uses.” This proposal does the opposite.

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- Violent altercations, assaults, and property damage, particularly at night.
- Public drunkenness, intimidation, and vandalism affecting residents, tourists, and businesses.

Concentrating more high-density or transitional housing in this location without robust security, management, and social support measures will amplify these issues, placing further strain on police, emergency services, and council resources.

8. Proximity to Doctors Gully & Risk of Antisocial Behaviour

The site backs onto historically significant Doctors Gully, a known gathering place where antisocial behaviour, public drinking and littering already occur. Higher-density development here risks:

- Amplifying existing social issues and call-outs.

- Reducing perceived and actual community safety, particularly at night.
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11. Better Locations Are Available

Social and affordable housing should be integrated sensitively into the urban fabric, with access to public transport, services, and employment. Other sites closer to the CBD or on already-zoned higher-density land would be far more suitable, avoiding the destruction of existing residential neighbourhood character.

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Conclusion

For the reasons outlined above, this amendment is contrary to the intent of the NT Planning Scheme, threatens community safety and amenity, and risks setting a precedent for inappropriate rezonings in Larrakeyah.

I urge the Planning Commission to refuse **PA2025/0283** and retain the current **LMR zoning**. Darwin needs more housing — but it must be well-planned, context-sensitive, and respectful of existing communities.

Sincerely,

A handwritten signature in black ink, consisting of a stylized 'W' followed by a long horizontal line extending to the right.

Warren Fryer
28 Packard Street, Larrakeyah.

Subject: Objection to PA2025/0283 – Planning Scheme Amendment
(12 Doctors Gully Rd & 121 Mitchell St, Larrakeyah)

To: Development Assessment Services
City of Darwin / NT Planning Commission

Dear Sir/Madam,

I am writing to formally object to Planning Scheme Amendment **PA2025/0283**, which proposes to rezone Lots 03494 and 05727 (12 Doctors Gully Rd & 121 Mitchell St, Larrakeyah) from **LMR (Low-Medium Density Residential)** to **SU (Specific Use)** to facilitate social and affordable housing.

While I fully support the principle of providing more social and affordable housing in Darwin, this proposal is inappropriate for this location and would have a negative impact on the Larrakeyah community for the following reasons:

1. Loss of Residential Character

Larrakeyah is a low-to-medium density residential area with a unique heritage character and village-like feel. Allowing a "Specific Use" zone here undermines the intent of the existing LMR zoning, which was designed to protect this balance. Rezoning sets a dangerous precedent, opening the door to further ad-hoc developments that could erode the area's residential amenity and liveability.

2. Conflict with NT Planning Scheme Objectives

The current LMR zoning exists to provide a low-to-medium density residential environment that is safe, liveable, and consistent in scale with surrounding properties.

- Clause 5.1 (Strategic Planning Principles) of the NT Planning Scheme requires development to be "compatible with the existing and future character of the locality."
- Clause 6.2.1 (Residential Zones Purpose) seeks to "maintain amenity, privacy, and solar access for existing and future residents."

Rezoning to Specific Use removes these controls, allowing potentially intensive development that will compromise residential character, amenity, and the expectations of existing residents who purchased in good faith under LMR zoning.

3. Overdevelopment Concerns

"Specific Use" zoning gives the developer significant flexibility with height, density, and design controls. This creates uncertainty for residents and may result in a development that is out of scale with surrounding homes and apartments, overshadowing existing dwellings, removing natural light, and severely impacting privacy.

4. Traffic and Parking Impacts

Doctors Gully Road and Mitchell Street are already under pressure, with limited on-street parking and high traffic volumes, particularly during peak hours and tourist season. A large housing development would significantly increase congestion, parking stress, and road safety risks, especially for pedestrians and cyclists.

- Additional housing density will exacerbate traffic volumes, increasing the risk of collisions.
- On-street parking is already under significant pressure; this development risks spillover parking into neighbouring streets.
- The area lacks sufficient pedestrian infrastructure to safely accommodate increased movements from a high-density development.

These impacts directly conflict with Clause 5.2 of the NT Planning Scheme, which calls for “safe and efficient movement networks” that do not adversely impact residential amenity.

5. Environmental and Amenity Impacts

This part of Larrakeyah has significant tree cover and contributes to the urban cooling of the area. Intensive development risks loss of mature trees, green space, and biodiversity, reducing the neighbourhood’s visual amenity and worsening the urban heat island effect.

6. Community Safety & Childcare Proximity

There is a childcare facility immediately adjacent to the proposed site. High-density or transitional housing, without clear management protocols, raises legitimate concerns about:

- Increased foot traffic and loitering in an area frequented by children and families.
- Safety risks for vulnerable road users, including children, parents, and pedestrians.
- Potential exposure to antisocial behaviour from visitors or residents if proper social support and security measures are not in place.

The NT Planning Scheme emphasises the importance of “safe and convenient access for pedestrians and cyclists” and development that “minimises potential conflicts between land uses.” This proposal does the opposite.

7. Existing Antisocial Behaviour, Violence & Police Call-Outs

The Larrakeyah area already experiences:

- Frequent police call-outs for disturbances and alcohol-related incidents.
- Violent altercations, assaults, and property damage, particularly at night.
- Public drunkenness, intimidation, and vandalism affecting residents, tourists, and businesses.

Concentrating more high-density or transitional housing in this location without robust security, management, and social support measures will amplify these issues, placing further strain on police, emergency services, and council resources.

8. Proximity to Doctors Gully & Risk of Antisocial Behaviour

The site backs onto historically significant Doctors Gully, a known gathering place where antisocial behaviour, public drinking and littering already occur. Higher-density development here risks:

- Amplifying existing social issues and call-outs.

- Reducing perceived and actual community safety, particularly at night.
- Detracting from the tourism and environmental value of Doctors Gully, which is a historic site and gateway to the waterfront.

9. Access to Alcohol Risk

There are several licensed venues and bottle shops within walking distance of the proposed development site. This creates a high-risk environment for alcohol-related harm, including:

- Increased likelihood of public drinking and intoxication spilling into surrounding streets, open spaces, and Doctors Gully.
- Greater potential for noise disturbances, vandalism, and property damage, particularly late at night.
- A clustering effect that exacerbates existing community safety concerns.

The NT Planning Commission must consider the cumulative impact of alcohol availability when assessing rezoning proposals, as recommended by the NT Alcohol Policies and Legislation Review (Riley Review).

10. Existing Social Services – Cumulative Impact

The Silos Roberts Hostel, a transitional housing facility, is located nearby. The area is already providing a substantial share of Darwin’s social and transitional accommodation. Adding another significant facility here will:

- Concentrate social housing in one small area, contrary to best practice planning, which calls for integration across multiple suburbs to avoid overburdening any single neighbourhood.
- Intensify demands on local infrastructure, open space, and community safety resources.
- Increase the risk of antisocial behaviour “hotspots,” further impacting residents and visitors.

11. Better Locations Are Available

Social and affordable housing should be integrated sensitively into the urban fabric, with access to public transport, services, and employment. Other sites closer to the CBD or on already-zoned higher-density land would be far more suitable, avoiding the destruction of existing residential neighbourhood character.

12. Lack of Community Consultation

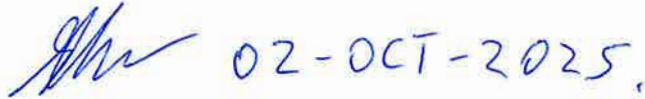
This amendment was placed on exhibition for a limited period with minimal community awareness. Residents must be properly consulted on a proposal of this scale and impact, with clear details of height, number of dwellings, parking provisions, and design. Rezoning without this transparency is unacceptable and represents poor planning practice.

Conclusion

For the reasons outlined above, this amendment is contrary to the intent of the NT Planning Scheme, threatens community safety and amenity, and risks setting a precedent for inappropriate rezonings in Larrakeyah.

I urge the Planning Commission to refuse **PA2025/0283** and retain the current **LMR zoning**. Darwin needs more housing — but it must be well-planned, context-sensitive, and respectful of existing communities.

Sincerely,

A handwritten signature in blue ink, followed by the date "02-OCT-2025," also written in blue ink.

Stuart Charleston
Unit 2 17 Packard Street, Larrakeyah 0820.

Subject: Objection to PA2025/0283 – Planning Scheme Amendment
(12 Doctors Gully Rd & 121 Mitchell St, Larrakeyah)

To: Development Assessment Services
City of Darwin / NT Planning Commission

Dear Sir/Madam,

I am writing to formally object to Planning Scheme Amendment **PA2025/0283**, which proposes to rezone Lots 03494 and 05727 (12 Doctors Gully Rd & 121 Mitchell St, Larrakeyah) from **LMR (Low-Medium Density Residential)** to **SU (Specific Use)** to facilitate social and affordable housing.

My wife and I have a number of objections in relation to his planning proposal and we significantly feel that there are more appropriate ways for this land to be utilised to better fit within the area, and not contribute further to the current issues. We do support the need for additional housing in Australia, and certainly believe it important for further social available housing particularly for women who may be seeking support from domestic violence. We just feel that there are better options and the current proposal is not ideal for either the current community or the future proposed tenants.

We would highlight that a number of these points and issues are a shared concerns with other residents, but we feel it necessary to highlight them again, with the perspective of our specific concerns and views.

1. Loss of Residential Character

Larrakeyah is a low-to-medium density residential area with a unique heritage character and village-like feel. Allowing a "Specific Use" zone here undermines the intent of the existing LMR zoning, which was designed to protect this balance. Rezoning sets a dangerous precedent, opening the door to further ad-hoc developments that could erode the area's residential amenity and liveability.

2. Conflict with NT Planning Scheme Objectives

The current LMR zoning exists to provide a low-to-medium density residential environment that is safe, liveable, and consistent in scale with surrounding properties.

- Clause 5.1 (Strategic Planning Principles) of the NT Planning Scheme requires development to be "compatible with the existing and future character of the locality."
- Clause 6.2.1 (Residential Zones Purpose) seeks to "maintain amenity, privacy, and solar access for existing and future residents."

Rezoning to Specific Use removes these controls, allowing potentially intensive development that will compromise residential character, amenity, and the expectations of existing residents who purchased in good faith under LMR zoning.

3. Overdevelopment Concerns

“Specific Use” zoning gives the developer significant flexibility with height, density, and design controls. This creates uncertainty for residents and may result in a development that is out of scale with surrounding homes and apartments, overshadowing existing dwellings, removing natural light, and severely impacting privacy.

We raised clear concerns in regards to this matter during the supposed community consultation phase. We live at 30 Packard Street, and the proposed future building, if rezoning occurs, would directly overlook our backyard, pool and rear windows. This creates serious concerns in regards to privacy, and the unfortunate nature of close proximity to a low density dwelling of a high density dwelling and the behaviour and actions of people living at height above a house close by.

This was certainly not a proposed development when we purchased our property 3 years ago, and the current zoning provided a level of protection against this, which we believe still needs to stand.

4. Traffic and Parking Impacts

There are already existing parking and traffic issues in Doctors Gully Road and Mitchell Street. Existing parking is very limited and other close by high density housing and seeing people parking on the street, with limited availability for additional parking for further high density housing. Further parking and traffic will create increased congestion on an existing busy roads, with increased risks to pedestrians, and to other cars. With the nature of the community area involving children being dropped off at the adjacent child care and nearby school, this risk is further increased for young children.

Off-street parking for the child care would also be at risk, and with the current issues around available car parks it is likely that the current car parks being used to safely drop children off to will be utilised by new residents at the proposed development. This will create a situation adding burden on the existing community usage, as well as further increase risk for young families as they are forced further from the existing and long established child care facility.

These concerns directly relate and conflict with Clause 5.2 of the NT Planning Scheme, which calls for “safe and efficient movement networks” that do not adversely impact residential amenity.

5. Environmental and Amenity Impacts

The area surrounding the proposed development, including Doctor’s Gully is a swathe of green area with established vegetation adding to liveability of the surrounding community. It also adds to the attraction from a tourism perspective for the area and is in line with the existing zoning of the property. A further high density development in this area would likely affect the nature of the walkways and green area, and detract from what is an important highlight of the local community.

6. Community Safety & Childcare Proximity

As already discuss the proposed development is adjacent to a long term established child care facility. Further high density development directly adjacent to this complex would mean that residents would have be directly overlooking the child care premises, not an ideal situation for young families. The nature of the proposed social housing is also likely to increase or attract additional visitors which may increase loitering in the area and increased anti-social behaviour which is an existing issue within the neighbourhood.

7. Existing Antisocial Behaviour, Violence & Police Call-Outs

The Larrakeyah area already experiences:

- Frequent police call-outs for disturbances and alcohol-related incidents.
- Violent altercations, assaults, and property damage, particularly at night.
- Public drunkenness, intimidation, and vandalism affecting residents, tourists, and businesses.

Concentrating more high-density or transitional housing in this location without robust security, management, and social support measures will amplify these issues, placing further strain on police, emergency services, and council resources.

8. Access to Alcohol Risk

There are several licensed venues and bottle shops within walking distance of the proposed development site. This creates a high-risk environment for alcohol-related harm, including:

- Increased likelihood of public drinking and intoxication spilling into surrounding streets, open spaces, and Doctors Gully.
- Greater potential for noise disturbances, vandalism, and property damage, particularly late at night.
- A clustering effect that exacerbates existing community safety concerns.

The NT Planning Commission must consider the cumulative impact of alcohol availability when assessing rezoning proposals, as recommended by the NT Alcohol Policies and Legislation Review (Riley Review).

9. Existing Social Services – Cumulative Impact

The Silos Roberts Hostel, a transitional housing facility, is located nearby. The area is already providing a substantial share of Darwin's social and transitional accommodation. Adding another significant facility here will:

- Concentrate social housing in one small area, contrary to best practice planning, which calls for integration across multiple suburbs to avoid overburdening any single neighbourhood.
- Intensify demands on local infrastructure, open space, and community safety resources.
- Increase the risk of antisocial behaviour “hotspots,” further impacting residents and visitors.

As local residents this is a very serious concern for us, as we see a constant flow of people back and forward along the street, with public drinking and drug taking occurring outside of our home and concerns for personal safety at night.

10. Better Locations Are Available

Social and affordable housing should be integrated sensitively into the urban fabric, with access to public transport, services, and employment. Other sites closer to the CBD or on already-

zoned higher-density land would be far more suitable, avoiding the destruction of existing residential neighbourhood character.

There is little opportunity to further extend the local amenities, school, traffic congestion within the Larrakeyah area and so this type of house or density targeting families would be better situated in a suburb that can accommodate this and is further growth potential.

11. Lack of Community Consultation

The community consultation process that occurred in our opinion did not take our significant concerns seriously, and in response to these concerns conflate them with other items not addressed by us, or simply provided an answer that the government is targeting increase socially affordable housing implying that we need to just to accept this rezoning and redevelopment over our legitimate personal and community concerns.

I don't feel that this was proper consultation that took in to account the raised concerns and tried to adjust the approach of the future development, rather it felt like a compliance approach.

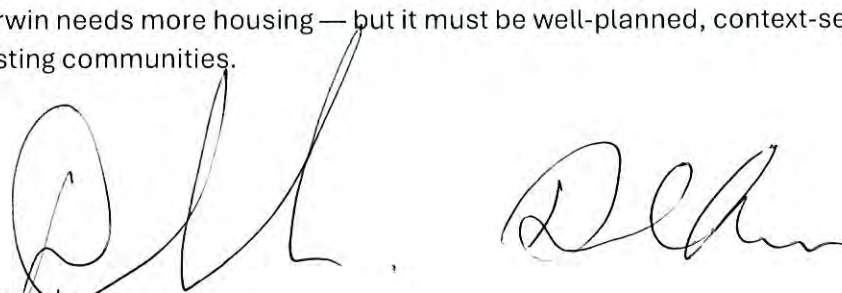
Recommendation

We do not believe that the proposed rezoning is the best fit for the local community and is line with the NT Planning Scheme key areas of conflict in regards to NT Planning including the importance of:

- *“safe and convenient access for pedestrians and cyclists”*
- *“minimises potential conflicts between land uses.”*

On both these key concerns, and other key concerns including safety, lack of amenities, privacy, anti-social behaviour which have been raised above, we do not believe that this proposed rezoning and redevelopment is in the best interest of the community, nor the future residents who would experience an increased negative experience. We believe that when considered in its fullness the proposed zoning amendment does not meet the intent of the NT Planning scheme and should not be accepted.

I urge the Planning Commission to refuse **PA2025/0283** and retain the current **LMR zoning**. Darwin needs more housing — but it must be well-planned, context-sensitive, and respectful of existing communities.



Sincerely,
Damien and Kim Charles

30 Packard Street

Larrakeyah, NT 0820



NT Planning Commission
GPO Box 1680
DARWIN NT 0801

Via email: planning.ntg@nt.gov.au

RE: Letter of Support for the proposal to amend the Northern Territory Planning Scheme PA2025/0283

NT Shelter welcomes the opportunity to provide feedback on the YWCA's proposal to amend the Northern Territory Planning Scheme PA2025/0283.

NT Shelter is the Northern Territory's peak body for social, affordable housing and homelessness. We advocate for affordable and appropriate housing for all Territorians, especially those on low incomes who are particularly vulnerable and disadvantaged in the housing market.

NT Shelter's work involves research and policy development, advocacy and communications, sector consultation and coordination, and capacity building. We represent and support the work over 33 members across the Northern Territory.

Socio-economic disadvantage, housing insecurity, and homelessness in all its forms are a reality in Darwin. On Census night 2021, almost 2,000 people were experiencing homelessness in the Greater Darwin region. At the time of writing, Darwin is the second most expensive capital city in Australia in which to rent a house and wait times for social housing can be longer than ten years.

The delivery of well-designed and diverse housing options, which include social and affordable accommodation is essential to thriving communities. Social and affordable housing is vital infrastructure that reduces homelessness and poverty, boosts social and economic inclusion, and fosters diverse, vibrant communities.

Darwin's Domestic and Family Violence crisis:

The Northern Territory is far from where it needs to be in terms of ensuring adequate housing and accommodation supports are available and accessible to people experiencing Domestic and Family Violence (DFV). Almost half the people seeking support from homelessness services in the NT cite DFV as the main reason for them seeking assistance. This equates to a staggering 4919 individuals impacted by DFV experiencing homelessness.

International research highlights the necessity of strong support systems in supporting women and children to transition quickly out of homelessness, as without, "in many cases they are left with no option but to return to situations of violence, precarity, and marginalization." Stable and secure housing is a critical aspect of health and wellbeing and underpins outcomes in respect of education, employment and participation in the economy.

Financial implications have been reported by single mothers as a reason for returning to a previous violent partner following a temporary separation. Analysis of the 2016 Personal Safety Survey conducted by the Australian Bureau of Statistics (ABS) showed that of the 'single

mothers' who had experienced partner violence, more than half (55%) had separated from the violent partner. Almost one-quarter (24%) of these women said they had returned to the violent partner because they had no money or financial support and 14% said they had nowhere else to go.

In support of the proposal to rezone Lot 3494 and Lot 5727 from LMR to SU:

YWCA have a long history of managing housing and accommodation for some of the NT's most vulnerable cohorts. The YWCA has a proven track record in delivering housing solutions in the Northern Territory that are not only affordable and secure but also supported by wraparound services that promote long-term stability and independence.

Women, particularly those escaping family violence, are disproportionately impacted by housing stress. The YWCA applies a trauma-informed approach that ensures safety, dignity, and inclusivity.

Unlike property managers that focus solely on tenancy management, the YWCA integrates housing with essential supports. The YWCA connects people with the support they need to thrive — including financial counselling, employment pathways, and wellbeing services. This holistic approach reduces tenancy breakdowns and helps individuals transition from crisis to independence. YWCA tenants don't just survive, they succeed.

The YWCA's housing initiatives directly align with the Northern Territory governments strategies to reduce homelessness, improve women's safety, and foster stronger, more resilient communities. The housing crisis demands solutions that are safe, inclusive, and effective. The YWCA is uniquely positioned to deliver on these needs, combining housing management with holistic support to create lasting outcomes for women, families, and communities.

The properties owned by the YWCA, Lot 03494 12 Doctors Gully Rd and Lot 05727 121 Mitchell St Larrakeyah are underutilised and would remain underutilised without a change in Zoning from Low Medium Density Residential to Specific Use. The property is bound by high rise buildings. A multi-story complex on this site would not be out of place and it would not impact single density housing in Larrakeyah. If the YWCA construct a development of similar height to its neighbours at 117 or 112 Mitchell St it would be reflective of the existing neighbourhood. Rezoning to allow for better utilisation of these Lots would allow YWCA to develop a sustainable business model that would effectively reduce Darwin's homelessness numbers and the numbers of abused women and children forced to return to violent households. An efficient use of this land will also contribute to a better use of Darwin's limited crisis and emergency facilities and resources allowing for more families to escape dangerous situations. Maximising the use of this property will allow mothers escaping violence to access the supports and time needed to establish new productive and safe futures for their families.

Addressing the issue of reduced car park spaces:

These Lots are ideally located close to services as evidenced by the number of unit complexes and high-density developments built in the area. They are in close proximity to public transport, shopping centres, recreational facilities, employment opportunities and are walking distance to local childcare facilities.

The nature of the proposed development implies that a majority of tenancies will essentially be one adult households. Statistics indicate that mothers who move out of the home when they escape a violent partner leave behind property or assets. The 2021–22 Personal Safety Survey conducted by the ABS estimated that about 2 in 3 (64%) women moved away from home when their relationship with a violent partner ended. Of those that moved away, 7 in 10 (69%) left property or assets behind (ABS 2023).

Research and Census data also suggests that car ownership among social housing tenants is significantly lower than among the general population, particularly for single-parent households, low-income families, and inner-city renters. Estimates based on ABS statistics indicate that around 40–50% of single-parent households in social housing will have access to a vehicle. From the authors personal experience of operating supported accommodation for people experiencing homelessness in Darwin only around 30-40 % of residents owned a vehicle.

As social housing tenants, single parent families escaping DFV traditionally will in all likelihood not be multiple car families. As women and children escaping domestic or family violence they are unlikely to own multiple vehicles and given statistical evidence there is a reasonable chance that they will have no vehicle or other major assets.

Unlike the neighbouring developments at 112 and 117 Mitchell St this development will unlikely house the traditional two parent family. As housing for women and families escaping DFV the proposed development will potentially have less tenant density and certainly less vehicle density than neighbouring properties. A 2-bedroom unit for private rental or private ownership in the city can potentially be a 4 Adult, 4-car household. This will not be the case at this location where the YWCA will have more control and be more hands on in managing tenancies than private property managers.

Conclusion:

In conclusion, the YWCA's proposed development at Lot 03494, 12 Doctors Gully Rd and Lot 05727, 121 Mitchell St Larrakeyah represents a critical opportunity to address the severe gaps in housing and support for women and children escaping Domestic and Family Violence in Darwin. The sites are ideally located, have close access to public transport, essential services, recreational facilities, employment and childcare, making it well-suited to the needs of single-parent households. Evidence shows that women leaving violent relationships often lack financial resources, property and vehicles, underscoring the importance of well located, secure supported housing.

By rezoning and maximising the use of these Lots the YWCA can develop a sustainable, appropriately scaled social housing complex reflective of the surrounding neighbourhood. With a hands-on, trauma-informed management approach, the YWCA will integrate housing with wraparound services including financial counselling, employment pathways, and wellbeing programs. This holistic model not only prevents tenancy breakdowns but also supports women and children to transition from crisis to stability and independence.

Ultimately, the development will make efficient use of existing underutilised properties, reduce demand for crisis and emergency accommodation, and provide safe, dignified, and inclusive

housing. It will directly contribute to reducing homelessness, improving safety, and enabling families to rebuild their lives in secure, supportive environments.

NT Shelter support the YWCA's application in their submission to amend the Northern Territory Planning Scheme to:

- Rezone the Subject land from Zone LMR to a specific use zone.
- Introduce a specific use zone into Schedule 4 of the Planning Scheme applicable to the subject land only.

And

- Amend the Central Darwin Area Plan to reflect the residential nature of the proposed zone.

Kind Regards

A handwritten signature in black ink, appearing to read "Michael Byrne", with a long horizontal flourish extending to the right.

Michael Byrne
Regional Coordinator North Australia
NT Shelter

16 September 2025

NT Planning Commission
GPO Box 1680
DARWIN NT 0801

Re: Application PA2025/0283 – Rezoning of Lots 5727 and 3494, Town of Darwin (121 Mitchell Street & 12 Doctors Gully Road, Larrakeyah)

From: Morgan Rickard Former City of Darwin Councillor; Former Member of the Development Consent Authority; Community Services Professional

Introduction and Position

I write in strong support of the proposal to amend the Northern Territory Planning Scheme to rezone Lots 5727 and 3494 from Zone LMR (Low-Medium Density Residential) to a Specific Use Zone (SDX) as outlined in the exhibited documents.

My perspective is informed by:

- **Local Government Experience** – Serving as a City of Darwin Councillor gave me direct experience balancing community expectations, growth, and amenity in land use planning.
- **Previous DCA Membership** (Darwin Division) – As a former DCA member, I am familiar with the legislative framework, planning scheme interpretation, and the importance of decisions that enable orderly development and serve the public interest.
- **Professional Expertise** – With over 15 years working in the NT community services sector, I bring a deep understanding of the housing and support needs of women and children affected by domestic, family, and sexual violence (DFSV).
- **Darwin Work & Residence** – Like so many other locals and visitors not directly impacted, I am frequently affected emotionally by witnessing the consequences of homelessness, housing stress, and ongoing violence. As a long term and dedicated Territorian, I'm committed to creating a safer, more compassionate, and more resilient Darwin for everyone.

This amendment represents a rare and critical opportunity to do that, by delivering safe, secure, and long-term housing for women leaving crisis accommodation – a need identified repeatedly by NT services and government policy frameworks.

Strategic and Policy Alignment

This proposal is consistent with the NT Planning Act and planning policy frameworks. In line with the considerations set out under Section 25(2), the amendment:

- **Promotes the Purpose and Objectives of the Act** – It supports orderly and sustainable development (s 2A(e)), reflects the needs of the community (s 2A(b)), and delivers good design outcomes (s 2A(j)) by redeveloping a dilapidated site into a well-managed residential complex.
- **Aligns with Strategic Frameworks** – It supports the Darwin Regional Land Use Plan and Central Darwin Area Plan, both of which encourage higher-density residential uses in the CBD fringe area.
- **Advances Compact Urban Growth Goals** – It places much-needed housing within an existing serviced area, reducing pressure for outward expansion and supporting a walkable, sustainable city.
- **Delivers HR Zone-Consistent Outcomes** – The Specific Use Zone references Zone HR (High Density Residential) provisions, ensuring development outcomes that are compatible with surrounding uses while accommodating a community housing provider.
- **Supports Social Policy Priorities** – It aligns with NT and national strategies to reduce DFSV, improve housing security, and support women's economic participation.

Appropriateness of the Specific Use Zone

The proposed SDX provisions offer certainty and appropriateness for the site:

- **Development Controls** – They apply HR zone provisions while providing for tailored car-parking rates and up to 100 m² of on-site office space for tenancy management.
- **Efficient Use of Land** – Parking rates are calibrated to reflect actual demand, supporting more space for landscaping and open areas.
- **Clarity for Future Applications** – By embedding key expectations in the zone, the amendment gives confidence that future development will deliver the intended community benefit.

Responding to Community Concerns

YWCA's May 2025 consultation summary demonstrates a commitment to transparency and engagement. The following issues were raised and have been addressed:

- **Safety & Behaviour** – This is long-term, managed housing – not a crisis facility. Tenancies will be allocated using eligibility criteria and managed under the Residential Tenancies Act.
- **Scale & Height** – The proposed height is consistent with nearby developments and suitable for the CBD fringe context.
- **Traffic & Parking** – A traffic and parking management plan will be provided as part of the development application, with further community input opportunities.
- **Amenity & Property Values** – Evidence shows that well-managed community housing stabilises neighbourhoods and supports positive community outcomes. Developments like this, with strong tenancy management, active maintenance, and partnerships with support services reduce incidents of anti-social behaviour and improve neighbourhood cohesion. Redeveloping a long-vacant site into a well-designed, professionally managed residential complex is likely to enhance local amenity, improve perceptions of safety, and contribute positively to the area's liveability.

Social and Community Need

This amendment directly addresses a critical shortage of long-term housing options for women and children:

- **Relieves Pressure on Crisis Services** – By allowing women to exit crisis accommodation, this development will free spaces for those in immediate danger.
- **Strengthens Safety Outcomes** – Safe, stable housing is one of the strongest protective factors against future violence.
- **Creates a Lasting Community Asset** – The development will provide secure, quality housing managed by an experienced national provider.
- **Activates a Key Site** – The former Banyan View Lodge has remained vacant; its redevelopment will improve local amenity and contribute to urban renewal.

Public Interest Consideration

The amendment clearly advances the public interest through:

- **Social Equity** – Creating secure housing pathways for disadvantaged Territorians.
- **Economic Contribution** – Supporting construction jobs, local suppliers, and ongoing employment in tenancy management and support services.
- **Urban Sustainability** – Delivering higher-density housing close to jobs, transport, and services, which reduces infrastructure costs and car dependency.

Conclusion and Request

This rezoning is not just a land-use matter – it is a social infrastructure decision with profound implications for women’s safety, wellbeing, and participation in our community.

As a former DCA member and local government representative, I am confident the proposed Specific Use Zone provides an appropriate planning framework to achieve high-quality, compatible development outcomes.

In light of the above, this amendment:

- **Is consistent with the purpose and objectives of the Planning Act and relevant strategic frameworks.**
- **Represents a significant public interest outcome, with enduring social and economic benefits.**
- **Provides an appropriate planning pathway for high-quality, well-managed community housing.**

I respectfully encourage approval of the proposed amendment to the Northern Territory Planning Scheme.



Morgan Rickard

From: Michael Howard <Michael.Howard@nt.gov.au> **On Behalf Of** DevRoads NTG

Sent: Monday, 8 September 2025 11:51 AM

To: Planning NTG <Planning.NTG@nt.gov.au>; DevRoads NTG <DevRoads.NTG@nt.gov.au>

Subject: RE: 'PA2025/0283 Lot 03494 Town of Darwin' - New Application Submitted

Hi Lands Planning,

TCI, DLI has no objections to this application as it does not affect DLI roads.

Cheers

Michael Howard

Technical Assessment Officer
Corridor Management and Design, Transport & Civil Infrastructure
Department of Logistics & Infrastructure

Level 3, Highway House, Palmerston Circuit, Palmerston
PO Box 61, Palmerston NT 0831

t. (08) 89247252

e. michael.howard@nt.gov.au |



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The NT Government acknowledges the Aboriginal people and cultures of the land and country on which we work and live. We acknowledge the ongoing connection to culture, land, sea and community and pay our respects to Elders past and present and to emerging leaders.

From: Planning NTG <Planning.NTG@nt.gov.au>
Sent: Friday, 5 September 2025 5:11 AM
To: DevRoads NTG <DevRoads.NTG@nt.gov.au>
Subject: 'PA2025/0283 Lot 03494 Town of Darwin' - New Application Submitted

Dear Transport and Civil Infrastructure - DLI,

A proposed planning scheme amendment to Rezone land from LMR to a specific use zone to facilitate social and affordable housing at 12 Doctors Gully Rd , Larrakeyah NT and 121 Mitchell St , Larrakeyah NT is to be subject to a 28 day public exhibition period, commencing 05/09/2025 and closing on 03/10/2025.

This application can be [viewed](#) and comments can be made through [ILIS](#) until 03/10/2025.

If you have an enquiries, please feel free to contact Lands Planning Darwin, 8999 8963.

Kind Regards,
Lands Planning

Phone 1800 245 092

Web powerwater.com.au

Record No: D2025/339324

Container No: NE200/3494

Your Ref: PA2025/0283

Ellen Shannon
Development Assessment Services
GPO Box 1680
Darwin NT 0801

Dear Ellen

Re: Lot 3494 (12) Doctors Gully Road and Lot 5727 (121) Mitchell Street Larrakeyah Town of Darwin

In response to your letter of the above proposal for the purpose of rezone land from LMR to a specific use zone to facilitate social and affordable housing, Power and Water Corporation (PWC) advises the following with reference to electricity enquiries:

1. PWC does not object the proposed rezoning provided that the landowner (YWCA Australia) shall be responsible for establishing suitable underground power servicing requirements for the future development.
2. If the above proposed specific use zone (NTPS 2000) rezoning application is granted, YWCA Australia shall engage an accredited electrical consultant and contractor to design and construct the required underground power servicing compliance suitable for future subdivision/development.

If you have any further queries, please contact the undersigned on 8924 5729 or email:
PowerDevelopment@powerwater.com.au

Yours sincerely



Thanh Tang
Manager Distribution Development

08 September 2025



Container No: F2020/1792

DLPE - Development Assessment Services
GPO Box 1680
Darwin NT 0801

Dear Ellen Shannon

RE: PA2025/0283 - Lots 3494 & 5727 Town of Darwin - 12 Doctors Gully Rd, Larrakeyah NT & 121 Mitchell St, Larrakeyah NT - Rezone land from LMR to a specific use zone to facilitate social and affordable housing

In response to your letter of the above proposal for development application purpose, Power and Water Corporation advises that;

1. Easements shall be created over all Power and Water assets that traverse the subject lots.

Power Water have no objects to the propose rezoning application. The landowner is to note that future development activity on the subject lots will trigger upgrades that could include;

- Only a single water and sewer service is permitted for any future consolidated lot. All new services are to be constructed by the developer, at no cost to Power and Water.
- The developer will need to upgrade the existing water and sewer service when development proceeds and the developer should contact Services Development prior to start of construction.
- The existing sewerage easements within the subject Lot is still required. Structures must not be located on or over a water supply or sewerage easement, or where no easement exists (such as within a road), within 1.5 metres of the centreline of water and/or sewer main infrastructure.
- PWC recommends that the developers' hydraulic consultant confirm internal firefighting requirements with PWC prior to any development, so that flow capability can be adequately assessed.

If you have any further queries, please contact the undersigned on 8924 5226, or email waterdevelopment@powerwater.com.au

Yours sincerely

Craig Thomas

Craig Thomas
Services Development

17 September 2025

cc: Brad Cunnington
email: brad@crtpc.com.au



Department of
**HOUSING, LOCAL GOVERNMENT
AND COMMUNITY DEVELOPMENT**

Level 2 RCG Centre
Floor 2, RCG Centre, 47 Mitchell Street,
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15 September 2025

Postal address
GPO Box 37037, Winnellie, NT 0821

Development Assessment Services
VIA: das.ntg@nt.gov.au

E Planninghousingsupplydhlgcd@nt.gov.au

File reference<TRMNo.>

Dear Sir/Madam

Re: PA2025/0283 - Planning Scheme Amendment 121 Mitchell Street Larrakeyah

The Department of Housing Local Government and Community Development supports the YWCA proposal to rezone and introduce a suitable Specific Use Zone at 121 Mitchell Street and 12 Doctors Gully Road Larrakeyah. The YWCA is a registered Tier 2 Community Housing Provider.

While the existing facility closed in 2019, the building previously provided social housing options in the CBD. Since its closure there have been no new housing options for women and children escaping violence. The site is a key location along the CBD – Cullen Bay transport corridor, with the existing building continuing to deteriorate.

The Housing Australia Future Fund (HAFF) is providing Community Housing Providers funding opportunities to construct purpose-built accommodation for affordable and social housing. There is a lack of housing for seniors' women, and women and children escaping domestic violence. There are limited options for women experiencing domestic and family violence to exit crisis accommodation into secure long-term accommodation. This development will fill a much-needed gap in the housing continuum.

The YWCA have identified a need for purpose built social and affordable housing for women to have long term safe and secure housing close to the city centre. There is an imbalance of social and affordable housing concentration in Darwin and Palmerston which leads to areas with a high concentration of low-income residents often separated from opportunities and services and which contributes to greater socioeconomic inequality. This spatial segregation is driven by high housing costs that push lower-income households to the periphery, creating "mismatches" between where people live and where jobs are. Policies aimed at de-concentrating social housing and encouraging a mix of tenures are seen as potential solutions to improve wellbeing and social outcomes.

Funding under HAFF Round 1 and 2 has closed and will result in the construction 162 new social and affordable housing dwellings. However urgent additional housing supply is needed across the Territory, and it is anticipated that HAFF Round 3 will open later in 2025 which will provide further housing opportunities for Community Housing Providers. Further HAFF Rounds 4 and 5, will be suitable to provide funding for the YWCA Mitchell Street Development. Without approval to rezone this development, this housing project will be unable to achieve a yield necessary to ensure viability under the HAFF concessional funding market models.

Yours sincerely

A handwritten signature in blue ink, appearing to read "Michelle Walker".

Michelle Walker

General Manager Programs Executive



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Harry Chan Avenue
Darwin NT 0800

GPO Box 84
Darwin NT 0801

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Lands Planning GPO
Box 1680 DARWIN NT
0801

Please Quote: PA2025/0283

Date: 3 October 2024

Dear Sir / Madam

Parcel Description: Lots 5727 and 3494 Town of Darwin (121 Mitchell Street and 12 Doctors Gully Road, Larrakeyah)

Application: Rezone land in zone LMR to a Specific Use Zone - 121 Mitchell Street and 12 Doctors Gully Road

Thank you for the Planning Scheme Amendment (PSA) for 121 Mitchell Street and 12 Doctors Gully Road, Larrakeyah, referred to this office 05 September 2025. This letter was placed before Council at the Ordinary Council Meeting held on the 30 September 2025 and supported with the following commentary.

City of Darwin is committed to enhancing the quality of life and wellbeing of people living within our community by fostering a stronger sense of place and improving the liveability of Darwin. Our approach to place and liveability has been embraced by the community and other stakeholders and is consistent with the purpose and objectives of the Planning Act. It has helped shape the advice in this letter.

The PSA has been reviewed by City of Darwin's Technical Services and Planning teams. Based on this review, the proposed SUZ is considered to be:

- Consistent with the Northern Territory (NT) Compact Urban Growth Policy 2015, which applies to urban areas and encourages higher density housing that respects character, integrates with surroundings, and supports planned urban development.:
- Consistent with the Darwin Regional Land Use Plan 2015, which supports diverse higher-density housing in peri-urban areas near services and transport networks.
- Generally consistent with the Central Darwin Area Plan (CDAP), which currently indicates the site will be transitioned to TC, which provides for a similar form and density of development as the SUZ.

Given these matters and the fact that an adequate description of the proposed PSA has been provided with the application, the proposed SUZ is generally consistent with the applicable requirements of the *Planning Act 1999*, including the following sections:

- 2A(2)(a) – Explanation of the proposed amendment;



- 2A(2)(b) – Purpose and effect of the amendment;
- 12A(2)(c) – Assessment against Section 13(1) matters:
 - 13(1)(a) – Promotes the purpose and objectives of the Act (particularly those that promote orderly use and development, strategic land use planning and sustainable development);
 - 13(1)(b) – Not contrary to strategic frameworks (including the NT Compact Urban Growth Policy, Darwin Regional Land Use Plan, and Central Darwin Area Plan).

It is also proposed to update the CDAP to change the site's future designation from TC to SUZ. If the rezoning is approved, this would be a relatively minor administrative change.

Given the abovementioned matters, City of Darwin has no objections in principle to the proposed PSA.

If you require any further information in relation to this application, please feel free to contact the City of Darwin's Innovation Team, on 8930 0300 or darwin@darwin.nt.gov.au

Yours faithfully

Signed by:

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ALICE PERCY
GENERAL MANAGER INNOVATION

